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ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT
OF THE
MCCORMICK PAINT WORKS COMPANY
ROCKVILLE, MARYLAND

(MD - 398)

APRIL, 1992

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1.0 INTRODUCTION

1.1 AUTHORIZATION

The Maryland Department of the Environment, Hazardous and Solid Waste Management Administration (MDE/HSWMA) performed this study under U. S. Environmental Protection Agency (USEPA) Cooperative Agreement No. V-003577-01-0.

1.2 SCOPE OF WORK

The MDE/HSWMA was contracted to perform this Environmental Priorities Initiative - Preliminary Assessment (EPI-PA) of the McCormick Paint Works Company (MPWC) site (MD-398) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The potential for the release of hazardous waste from the site is studied; and the consequent potential for exposure by means of migration through the groundwater, surface water and air pathways and direct exposure to the soil is evaluated. The populations and sensitive environments which are located along the potential exposure pathways are then described.

1.3 EXECUTIVE SUMMARY

The McCormick Paint Works Company (MPWC) site, which is approximately 1.6-acres, is located in the southeastern corner of Rockville, Maryland in an area that is primarily residential but also includes commercial businesses. It is privately owned, employs fewer than 100 employees at the Rockville location, and has been manufacturing water (90-93%) and oil/solvent-based (7-10%) paint products since 1967. Major structures on the site include offices, four warehouses, a manufacturing plant, testing laboratories, a repair and maintenance shop, three underground storage tanks, a drum storage yard, and an open yard and parking lot, the latter two of which are fenced.

Hazardous waste consisting of a spent solvent (mineral spirits)/paint sludge mixture is generated during the cleaning of mixing tanks used to make oil/solvent-based paints. The mixture is separated by settling, and the spent solvent decanted off and used to make oil/solvent based paints and stains. This solvent recycling practice has occurred throughout the Company's operating history.

From 1983-1990, the spent sludge was solidified and shipped off-site to an approved hazardous waste disposal facility. Since 1990, the MPWC has used the spent sludge to make paint products.

Four Solid Waste Management Units (SWMUs) were identified at the MPWC site: (1) A Satellite Accumulation Area for spent solvents/sludges located in the lower level of the manufacturing plant; (2) Fenced Drum Storage Yard; (3) Warehouse 3, including a Recycled Solvent Storage Area; and (4) Fenced Open Yard and Parking Lot.

Before 1990, drums of spent solvent and sludge were stored in all of these SWMUs periodically. Currently, the only significant quantities of hazardous wastes present on-site are 3-55 gallon drums of spent solvent/sludge kept in SWMU1. These wastes are generally stored for less than three days before they are used to make a batch of paint or stain.

Another waste produced during paint manufacture is a mixture of titanium dioxide and clay dust. Although not regulated under CERCLA or the Resource Recovery Conservation Act (RCRA), titanium dioxide may be toxic to humans. The MPWC has always recycled these dusts back through its manufacturing processes.

There are three underground storage tanks located in SWMU-2 that were installed in 1967. These tanks contain ethylene glycol, mineral spirits, and ester alcohol, and have never been inspected, so that their condition is perhaps unknown. The MPWC plans to replace these tanks in 1992.

The majority of the 153,223 people (99.8%) within a four mile radius of the site, as well as the MPWC employees, receive potable water from two municipal systems, the Washington Suburban Sanitary Commission (WSSC) and the Rockville Department of Public Works (DPW). These systems draw water from intakes located on the Potomac and/or Patuxent Rivers, which are not on the surface water pathway for the site. About 335 people obtain drinking water from 129 private domestic wells located over two miles from the site.

The surface water runoff route from the site is northeast both overland and through storm drains to Rock Creek, which is about 0.85 mile away. The entire 15-mile surface water pathway is along Rock Creek, which flows at a rate of 10-100 cubic feet per second (cfs) and is used for recreational fishing. About 1.8 stream miles of palustrine forested wetland frontage are present along the pathway. The length of the surface water pathway that occurs in Washington, DC is a National Park.

There are six homes located within 200 feet of the eastern perimeter of SWMU-4. However, up to 1990, when this SWMU was active, most wastes were stored on its western side. The SWMU is paved with concrete, and is not suspected of being contaminated with hazardous wastes. There are no schools or day care centers within 200 feet of any SWMUs. The western and northern perimeters of the MPWC property are fenced, the site is equipped



with a 24-hour alarm system, and the buildings and entrance gate are kept locked after working hours, all of which discourage unauthorized individuals from entering the property.

No major spills of hazardous wastes are known to have occurred during the MPWC's operating history. This coupled with the Comapny's past and present waste handling, disposal, and recycling practices, have reduced the potential for releases of hazardous wastes to the environment.

2.0 SITE DESCRIPTION

The McCormick Paint Works Company (MPWC) site is located in Montgomery County at 2355 Lewis Avenue, Rockville, Maryland in a mixed residential and commercial area. It is situated at 39°3′52" north latitude by 77°7′21" west longitude on the Kensington, MD 7.5 minute U.S. Geological Survey (USGS) topographic quadrangle map. The Maryland Grid Coordinates of the site are 448,700 feet north by 765,250 feet east.

To reach the site from Baltimore, proceed south on
Interstate-95, then west on the Capitol Beltway (Interstate-495)
to the Rockville Pike exit (Route 355). Proceed north on
Rockville Pike for approximately 4.6 miles and turn right onto
Edmonston Drive. Go one block to Lewis Avenue and turn right;
the plant is located approximately 0.9 miles on the right side.

The 1.6-acre MPWC site is currently active as a paint manufactory. This acreage includes the areas of Warehouses 3 and 4, which are leased (Section 2.1).

Major structures on the site include a two-level manufacturing plant, four warehouses, a loading dock, testing laboratories, a repair and maintenance shop, offices, and a sales showroom for the Company's products (Figure 3). Also present are a drum storage yard, where three underground storage tanks and a

titanium dioxide dust collection unit are located, and a larger yard and parking area, both of which are outdoors and fenced.

The property is fenced along the western and northern perimeters, and excluding the drum storage yard, the entire site is covered with asphalt or concrete (Figure 3).

Small commercial businesses are located immediately north and south of the site. To the east, directly across Lewis Avenue, is a residential area. Twinbrook Elementary School is situated about 1500 feet northeast of the site. The Baltimore and Ohio (B&O) railroad tracks run adjacent to and less than 100 feet uphill of the western perimeter of the site. Paralleling the B&O tracks are Metroliner tracks; immediately west of these tracks are more small businesses.

The terrain under the site has a slope of 0-1% that increases to approximately 3.0% to the northeast. The surface water runoff route from the site is overland and through storm drains northeast to Rock Creek, which is about 0.85 mile (4,488 feet) away.

Hazardous wastes, primarily spent solvents and sludges, have been generated on-site since 1967 when the plant began operations. However, the MPWC ceased off-site shipment of all wastes in 1990.



Wastes produced from paint production and associated activities are currently kept on the first level of the manufacturing plant (spent solvents and sludges) and in the drum storage yard (titanium dioxide dust). These wastes are eventually reused in the manufacture of paints and stains (Sections 3.0 and 3.1).

2.1 SITE OWNERSHIP AND SITE USE

The site property is currently owned by Thomas P. McCormick, President of the MPWC, who purchased it in 1966. All of the site is owned by the MPWC, except for Warehouses 3 and 4, which are leased. A more complete site ownership history is given in Appendix A.

The MPWC has been manufacturing and distributing paint and related products since 1967. Currently, the Company manufactures an estimated 4,500 gallons of paint per day ²⁶. Of this amount, approximately 90-93% is water-based and 7-10% is oil/solvent-based paint.² The Company operates one shift and employs less than 100 people at the Rockville location.

The plant uses about 100 raw materials in its manufacturing processes, including titanium dioxide, calcium carbonate, aluminum silicate, water-based emulsions, alkyd resin, linseed oil, zinc oxide, mineral spirits, and ethylene glycol. 11,26



Certain bulk solvents, pigments, resins, and other chemicals are delivered by tanker trucks and gravity-fed to 6 above-ground storage tanks in the manufacturing plant, or to three underground storage tanks in the drum storage yard. Mineral spirits, ethylene glycol, and ester alcohol ("Texanol") (Appendix B) are stored in these tanks (Section 2.4); any excess material is usually drummed and taken to the plant to be used first. Ethylene glycol is used to make water-based paint, and ester alcohol and mineral spirits are used in oil/solvent-based paint.

Materials that are temperature resistant such as certain oils, alkyd resin, naptha, and mineral spirits may be kept in the drum storage yard along the western side of the fence. Other raw materials, including dry pigments, extenders, clays, and additives are stored in Warehouse 3.² Warehouses 1,2, and 4 are used to store finished paint products.¹⁷

Wastes generated at the site include spent solvent (mineral spirits) and sludge produced from cleaning certain paint mixing tanks in the plant, and a titanium dioxide dust resulting from paint manufacture. More information on the current and historical methods of handling, storing, and disposing of these wastes is contained in Sections 3.0 and 3.1.

No major spills of hazardous wastes are known to have occurred during the MPWC's operating history. 17,26 The Company



has procedures for handling any spills or releases in its Contingency Plan.

The MPWC is located in a predominantly residential area.

This area also includes some small commercial businesses adjacent to the site's northern and southern perimeters, and opposite the railroad tracks that parallel the western perimeter.

2.3 PERMIT AND REGULATORY ACTIONS

On July 29, 1980, the MPWC was issued an EPA identification number (MDD00003248275) under the federal Resource Conservation and Recovery Act (RCRA) and the Code of Maryland Regulations (COMAR) as a Controlled Hazardous Substances (CHS) generator. The Company shipped hazardous waste offsite to an approved disposal facility from 1983 to 1990. (Appendix C).

A RCRA Incident Report dated December 14, 1983 was submitted to the MPWC. Fifteen empty drums marked with the Company's hazardous waste labels were found off of Snouffer School Road near Gaithersburg. Upon investigation, it was determined that the drums had been donated to Kettler Brothers Contractors for non-hazardous uses, and that they were empty when given. Evidently the hazardous waste labels simply had not been removed before the empty drums were donated. No violations of federal or state environmental regulations were indicated (Appendix D).



A RCRA Enforcement Inspection was conducted at the MPWC by the MDE/HSWMA on December 27, 1990. The inspector determined that the MPWC (1) lacked a contingency plan and emergency procedures; (2) lacked a training program for handling hazardous wastes; (3) was storing hazardous spent solvents and sludges that were being held for recycling in the drum storage yard, which was not impervious and lacked secondary containment; (4) that the Company had not demonstrated that there was a market for the paint products manufactured from the spent solvent/sludge; and (5) that open five gallon cans containing hazardous waste solvent were present. In response to Item 3, the MPWC constructed a concrete diked area in Warehouse 3 for storage of spent solvents in January, 1991. A follow-up inspection performed on January 28, 1991 concluded that the MPWC was following all applicable COMAR/CHS regulations (Appendix D).

The MPWC was inspected by the MDE/Air Management

Administration in May and October, 1988, and February, 1989, and

found to be in compliance with all relevant regulations. 11

Currently, the Company has no federal or state environmental permits. 17

2.4 REMEDIAL ACTIONS

To date, no remedial actions under CERCLA are known to have taken place at the MPWC site. To the best of the Company's knowledge, no major spills of hazardous waste have occurred at the site during its operating history. 17,26

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In the drum storage yard, there are three underground storage tanks; two have a 1,000 gallon and one a 6,000 gallon capacity. Mineral spirits are kept in the 6,000 gallon tank, and ester alcohol and ethylene glycol are stored in the other two.

These tanks were installed in 1967 and have not been inspected. 26

The MPWC plans to replace these tanks in 1992. The new tanks will be equipped with measuring probes and leak detectors, and a monitoring panel will be installed in the Environmental Safety and Health Coordinator's office. 16,17



3.0 WASTE DESCRIPTIONS

The MPWC has been a paint manufactory and generator of hazardous wastes for 25 years. Hazardous waste present at the site is a mixture of spent solvent (mineral spirits) and paint sludge produced from the cleaning of oil/solvent-based paint mixing tanks. No solvents other than mineral spirits are used. An estimated 5,000 - 6,000 gallons of spent solvent/sludge are generated annually.²

Additionally, a mixture of titanium dioxide (up to 30%) and clay dust is produced during the manufacture of paint. Although not classified as a hazardous waste under CERCLA or RCRA regulations, titanium dioxide has an Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) of 15 milligrams per cubic meter, and if inhaled may cause slight lung fibrosis. 18 Approximately 6,000 pounds of dust are generated annually. 2

Before February, 1991, the MPWC collected and stored the spent solvents in 55-gallon drums in Warehouse 3, the drum storage yard, or the satellite accumulation area in the manufacturing plant (Section 3.1) In response to a RCRA Inspection in December, 1990, the Company constructed a concrete diked area in Warehouse 3 for the storage of spent solvents (Section 2.3).

Hazardous Waste Annual Reports are available for 1983-1990 and are included in Appendix C. No hazardous wastes were shipped off-site for disposal from August, 1990 through 1991.

From 1967-1982, the spent solvents and paint sludges were separated by natural settling. The spent sludge was solidified with clay and stored onsite; in 1983 the accumulated sludge was disposed of as a waste flammable material at an approved hazardous waste landfill. From mid-1984 to August, 1990, shipments of this kind of material were made at least every 90 days.³

From 1967-1990, most of the spent solvent was decanted off after settling and reused in the paint manufacturing process. The spent solvents were used to make exterior wood stains, and different oil/solvent-based paints, depending on the "color" of the solvent (Subsection 3.1.1). The only years that some spent solvents were shipped for offsite disposal were 1986 and 1990, presumably because there were some quantities that were not reusable.

Since August, 1990, the plant has been using the spent sludge in its manufacturing processes. After separation from the solvents, the sludges are used to produce a gray paint that is used in-plant, and a redoxide primer that is sold commercially.² (Appendix D).

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In 1983 and 1984, hazardous waste solids containing mercury were shipped for offsite disposal. Up to 1984, mercury was used as a preservative in water-based paints. Wastes containing mercury were formerly stored in Warehouse 3.2

Titanium dioxide and clay dust generated from paint production on both levels of the plant is suctioned through pipes by a dust collection unit located in the drum storage yard into 3-55 gallon drums with sealed covers. The dust is kept in the drum storage yard until it is needed to make a batch of paint. The MPWC has always recycled this dust throughout its entire operating history.

Small quantities of hazardous wastes are generated in the testing laboratories and the Spray Department. These wastes are reused in a manufacturing process.

The MPWC plant contains a tank for collection of wastewater from cleaning the water-based paint mixing tanks that is located on the upper level of the plant. This wastewater is recycled back through the manufacturing processes.

Used motor oil and antifreeze from the maintenance of vehicles were generated at the plant until 1991. These wastes were typically picked up by local gas stations or shipped offsite for disposal. The last shipment of waste oil was made on



January 31, 1991, and no vehicle maintenance producing wastes has been done on-site since then. 2,3

3.1 SOLID WASTE MANAGEMENT UNITS (SWMUs)

Four SWMUs have been identified at the MPWC site which are shown on Figure 3 and described in the following subsections.

3.1.1 SWMU1 - Satellite Accumulation Area

This SWMU is located on the first level of the manufacturing plant, and currently includes 3-55 gallon drums for the collection of spent solvent and sludge generated during the cleaning of oil/solvent-based paint mixing tanks. The tanks on the first level are portable and can be moved directly to the SWMU to be emptied. Spent solvent/sludge from the tanks on the second level of the plant is drained through pipes in the ceiling into 5-gallon containers and then transferred to the drums.

Each of the three drums contains either "clear," "white," or "colored" spent solvent, which is separated from the sludge and used to make different kinds and colors of paint products. The MPWC has reused most of its spent solvent throughout its operating history. The spent sludge has also been used as a raw material since August, 1990 (Section 3.0).

The spent solvents are held in sealed drums in this SWMU for 1-3 days before being used to make paints and stains. The floor of the unit is concrete, and there are no records of any spills.

This SWMU has been active since manufacturing began in 1967, and there are no plans for closure. Before February 1991, more than three drums of spent solvent/sludge were kept in this unit.

3.1.2 SWMU2 - Drum Storage Yard

The drum storage yard is fenced and located outdoors behind the manufacturing plant on the western side of the property. It is approximately 143'x 29' (4147 ft.²) and is covered with a gravel-like material that is not impervious.

From 1967 to 1991, drums of spent solvent and sludge were stored on the northern side of this SWMU.²⁶ Since then, no hazardous wastes regulated under CERCLA or RCRA are known to have been stored in the unit.

Drums of raw materials, empty drums, the titanium dioxide dust collection unit and drums, and the underground storage tanks containing ethylene glycol, ester alcohol, and mineral spirits are presently located here.



This SWMU has never had any secondary containment. However, no major spills are known to have occurred here.

3.1.3 SWMU3 Warehouse 3 - Recycled Solvent Storage Area

The MPWC began leasing Warehouse 3, which is approximately 4,500 ft.² in 1978.²⁶ From 1978 to 1991, hazardous spent solvents and sludges were stored here periodically. Also stored here through 1984 were hazardous waste solids containing mercury.

A recycled solvent storage area was constructed in January, 1991 on the northern side of Warehouse 3 in response to a RCRA inspection in 1990. It is a concrete diked structure that is 14' long, 5' wide, and 16" high, and has a 36 drum storage capacity (Appendix E).³

This storage area would be used to hold any drums of spent solvent that for some reason could not be recycled into a manufacturing process. Any such drums would eventually be shipped offsite for disposal at an approved hazardous waste facility.

No hazardous wastes were kept in this storage area in 1991, and none are being stored here at present. There are no plans for closure of this SWMU. During the site visit on October 25, 1991, 9-55 gallon drums of oil/solvent-based paint were

incorrectly being stored in this unit. On a second site visit on March 23, 1992, the storage area was empty.

Currently, only raw materials are being kept in Warehouse 3.26

3.1.4 SWMU4 - Fenced Open Yard and Parking Lot

The western side of this unit (5,751 ft.²) was used from about 1983 through August, 1990 as a temporary storage area for drums of hazardous waste awaiting transport offsite for disposal. The wastes were moved here from the other SWMUs so that they could be picked up by the trucks removing them from the site. Usually, wastes were kept here for no more than 24 hours.²

A few 55-gallon drums used to collect spent solvent from cleaning of manufacturing equipment being repaired in the Spray Department were also formerly kept in this SWMU (Figure 3).

This practice has been discontinued. 26

The entire SWMU is approximately 15,176 ft.² and is paved with concrete. Only empty 55-gallon drums are being stored here at present. There was no evidence of contamination of this SWMU with hazardous waste.²⁶

4.0 SPECIAL CHARACTERISTICS

The average annual precipitation at the MPWC site area is approximately 40 inches and the mean annual lake evaporation is about 34 inches. The average annual net precipitation is therefore 6 inches. The 2-year, 24-hour rainfall is approximately 3.4 inches.

Soil in the vicinity of the site is Glenelg Series silt loam with slopes which vary from 3 to 8% (Figure 6). 12 The Glenelg Series consists of moderately well-drained soils that developed from materials weathered from mica schist or, in some places, from granitized schist or gneiss. These soils have a well-developed textural subsoil that is substantially finer in texture than the surface soil layer. A typical profile of Glenelg silt loam included 0-8 inches of dark brown, subangular blocky to coarse, friable, crumb structure surface soil (A-Horizon). Flakes of mica and fragments of channery phyllite or schist are abundant. The boundary with the underlying subsoil is abrupt and smooth. The surface soil is strongly acidic.

The upper subsoil layer consists of 8-20 inches of yellowish-red channery, silty, clay loam with fine, subangular, blocky structure; friable when moist and plastic when wet.

Rootlets are fairly common and there are continuous clay skins in the root channels. The next subsoil layer extends from 20 to 37

inches and consists of partially weathered parent rock material in a matrix of yellowish-red, micaceous, silt loam.

Approximately 50% of this layer consists of partially weathered rock fragments. From 37 to 62 inches, weathered to partially weathered parent rock fragments predominate with only minor amounts of soil. Below 62 inches the parent rock may be largely

The entire Glenelg soil profile is acidic, with pH values ranging from 5.0 to 6.0. Acidity increases with depth in these soils. Hydraulic conductivity ranges from 10^{-3} to 10^{-4} centimeters per second (cm/sec). 12

4.1 GROUNDWATER AND GEOLOGY CONSIDERATIONS

unweathered.

The MPWC site is situated in the east-central portion of the Piedmont physiographic province, approximately 10 miles west of the Fall Line. The Piedmont Province is composed of igneous and metasedimentary rocks which have been tightly folded, intruded by granitic and mafic igneous rocks, and metamorphosed during the Appalachian Orogeny. These rocks have subsequently been uplifted and truncated by erosion to their present state. The regional structural lineation and fold axes trend in a north-south direction in this area of the Piedmont. The strata are steeply inclined, with dips ranging from 70° to 90°. 13



Crystalline rocks which comprise the Piedmont Province have been exposed at the surface for many millions of years. upper portion of these exposed rocks has been subjected to physical and chemical weathering processes which have produced a soil-like alteration product called saprolite. Essentially all exposed crystalline rocks in the Piedmont are covered by a mantle of saprolite which varies from 5 to 100 feet in thickness. saprolite retains some properties of the original parent rock (i.e. bedding, fractures, schistocity, foliation, etc.). Many of the more soluble chemical constituents in the original parent rock have been leached out or altered by groundwater. intensity of this weathering process generally decreases with depth and the saprolite grades into unaltered bedrock. weathering process is accelerated in fractures, bedding planes, joints, etc. where the groundwater moves freely through the rock. Saprolite zones are thickest in topographically high areas, and in rocks which are intensely fractured. Saprolite zones will thicken and thin locally in direct response to the presence of fractures.

Saprolites are excellent aquifers. The primary factors which determine the efficiency of a saprolite aquifer are: original parent rock type, degree of fracturing of parent rock, thickness, and topographic position. Saprolites also function as storage reservoirs for groundwater which may be transmitted to the deeper unaltered crystalline bedrock aquifers through

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fractures. The permeability within these bedrock aquifers occurs almost exclusively along fractures, bedding planes, and regional joint systems. These features are the conduits for groundwater infiltration from the saprolite to the unaltered crystalline bedrock aquifers below.

In the vicinity of the site, the Wissahickon Formation is the crystalline bedrock aquifer beneath the soil profile and saprolite zone. The Wissahickon Formation is composed of banded to laminated, quartz-rich phyllites and schists with accessory magnetite and garnets. Metamorphosed sandstone and conglomerate beds containing muscovite, chlorite, albite, and quartz are interbedded throughout, but are more common in the upper half of the stratigraphic section. Amphibole, commonly with accessory epidote, occurs as concordant layers ranging in thickness from 4 inches to over 75 feet. The amphibole comprises less than 1% of the total stratigraphic section in the Wissahickon, which is estimated to be 14,000 feet or more in thickness. This stratigraphic section has also been referred to as the "Upper Pelitic Schist" and the "Albite Facies" of the Wissahickon Formation.

The contact between the Wissahickon and the Sykesville

Formation occurs approximately 0.3 mile east of the site (Figure
5). The Sykesville consists of poorly-foliated to massive,

medium grained, biotite-plagioclase-quartz gneiss, which looks

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deceptively like granite in appearance. The gneiss contains numerous clasts ranging in size from granules to cobbles and some larger slabs. The clasts are composed of chloritized biotite schist, quartz pebbles and granules, and quartzo-feldspathic rock fragments. This formation has been referred to as the Boulder Gneiss. The Sykesville Formation also contains an intensely foliated schist member which is finer-grained than the boulder gneiss. The schist member is locally devoid of clasts, commonly garnetiferous, and contains abundant muscovite.

Within the Sykesville Formation, linear exposures of basic intrusive igneous rocks occur in a north-south alignment, which may represent the trace of a fault, or major fracture zone, or zone of tensional stress (Figure 5). There are no Karst aquifers within a four-mile radius of the site.

Domestic wells in the vicinity of the site range from 70 to 340 feet in depth. These wells tap bedrock aquifers which produce from fractures in the Wissahickon and Sykesville Formations. The nearest well is approximately 2.18 miles southwest of the site near Gainsborough Road in Willerburn Acres. 4,8 The static water level in this well was originally 37 feet and the pumping rate during the test was 4 gallons per minute (gpm). This well draws from the Wissahickon Formation and was completed open hole from 42 to 125 feet. No domestic wells could be located within a two mile radius of the site.

Approximately 129 domestic wells have been drilled since 1969 within a 4-mile radius of the site. It is not known how many of these wells are still in use today.

The depth to the aquifer is estimated to be less than 50 feet, although there are no wells known to be present within two miles of the site to confirm this.

There are no municipal wells within a four-mile radius of the site. 5

4.2 SURFACE WATER CONSIDERATIONS

The probable point of entry (ppe) to surface water is on Rock Creek, which is about 0.85 mile (4,488 feet) from the manufacturing plant. The surface water runoff route is northeast through a private residential area toward the Creek and is as follows: 1,000 feet overland; 1,400 feet through storm drains; and 2,088 feet overland to the ppe. There are no runon or runoff controls, and there is no vegetation on the MPWC site. Although it is unknown if there is any stressed vegetation along the remainder of the runoff route, it is unlikely, based on the Company's waste handling practices and the fact that no major spills are known to have occurred.

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The drainage area for the MPWC site is small. The area upgradient of the site is adjacent to the western perimeter of the property. Water would flow downhill to the site, and then follow the runoff route described above.

The entire 15-mile surface water pathway is along Rock Creek (Figure 7); 10.6 stream miles are in Montgomery County, and 4.4 stream miles are in Washington, D.C.⁷ From the ppe, the Creek flows southeasterly to the Maryland-District of Columbia (D.C.) line. It then flows in a southerly direction through D.C. beyond the 15-mile terminus where it empties into the Georgetown Channel of the Potomac River.

Rock Creek Regional Park is also located along the entire pathway. The area of the Park in Maryland is owned by Montgomery County and operated by the Maryland National Capitol Park and Planning Commission. 19 In Washington, D.C., Rock Creek Park is owned by the National Park Service and is considered to be a National Park. 20

The flow rate of Rock Creek along the surface water pathway is estimated to be between 10-100 cubic feet per second (cfs). There is a USGS gauging station located 12.6 miles downstream of the ppe that has been operating since 1929. The average flow rate of the Creek at this station is 62.4 cfs.²¹



Riverine, open water wetlands are present along the entire surface water pathway. Smaller segments of palustrine forested wetlands also border the Creek. 10 (Section 5.2)

No surface water intakes are known to exist on the pathway.

The MPWC site is located in the greater than 500 year floodplain. 15

4.3 SOIL ACCESSIBILITY CONSIDERATIONS

The 1.6-acre MPWC site is currently active, manufacturing and distributing water and oil/solvent-based paints and wood stains. The Company employs less than 100 workers at the Rockville location, and operates one shift. The entire site, except for the drum storage yard located on the western side, is covered with asphalt or concrete.

Based on past waste storage practices, the drum storage yard (SWMU2) could be an area where the soil is potentially contaminated with hazardous substances, since it is not on impervious ground. However, no major spills of hazardous wastes are known to have occurred during the Company's operating history. 17,26



Additionally, the site is fenced along both the western and northern perimeters of the property (Figure 3). Less than 100 feet adjacent to the western perimeter are the B&O railroad tracks and the Metroliner tracks, which are fenced on both sides. Directly west of the railroad tracks are a number of small commercial buildings. It is unlikely that anyone from these buildings would enter the site, since both the railroad tracks and the western perimeter of the property are fenced.

Commercial businesses are also located next to the northern and southern sides of the site.

Across Lewis Avenue, which is adjacent to the eastern perimeter of the property, is a residential area. There are six homes within 200 feet of the fenced open yard and parking lot (SWMU4). However, it is believed that when SWMU 4 was active, that most hazardous wastes were temporarily stored on the western side.

The gate to the fenced open yard and parking lot, and all buildings on the MPWC site, are kept locked after working hours. Additionally, the site is equipped with a 24-hour alarm system to help prevent the entry of unauthorized individuals. Therefore, under normal circumstances, it is unlikely that any residents, or customers or employees of nearby businesses would come into contact with any SWMUs.

No schools or day care centers are known to be present within 200 feet of any SWMU, and there are no terrestrial sensitive environments on-site.

During the site visit on October 25, 1991, no areas of stained soil or spills were observed.

4.4 NEARBY LAND USE CONSIDERATIONS

The nearest occupied building to any SWMU at the MPWC site is the manufacturing plant. The plant has no emissions stacks. Any odors associated with the manufacturing process are confined to the site property. 11

The land in the vicinity of the site has been developed for commercial, industrial, and residential uses (Figure 4). There are no known complaints by nearby residents about operations at the plant that are relevant to this EPI-PA. 17

Rock Creek Regional Park, a public recreational area, is located about 0.85 miles east of the site. The nearest school to the site is Twinbrook Elementary, which is about 1,500 feet to the northeast.

There are no wetlands greater than one acre within one-half mile of the MPWC site.

5.0 POPULATION DESCRIPTIONS

5.1 DRINKING WATER POPULATION

Potable water for the 153,223 people present within a four mile radius of the site is provided by two municipal systems and private domestic wells. The majority of people (about 152,888 or 99.8%) are served by the municipal systems, which are operated by the Washington Suburban Sanitary Commission (WSSC) and the City of Rockville Department of Public Works (DPW).

The WSSC system draws water from two surface water intakes, one on the Patuxent River, and one on the Potomac River. The intake and filtration plant on the Patuxent River are located near the T. Howard Duckett Dam at Rocky Gorge Reservoir.

This Reservoir is supplied by water from the Brighton Dam and Triadelphia Reservoir, which are 13 miles upstream. 22 (b) (9)



The Rockville intake, which is also on the Potomac River, supplies water for the City of Rockville, including the MPWC site. This intake is operated by the Rockville DPW, Water and Sewer Division.

Potomac River intake and the Route 189-190 intersection. 23

ORIGINAL

The remaining 335 people are served by 129 private domestic wells. 4 The distribution of these people, assuming an average of 2.6 persons per well for Montgomery County, is as follows:

Distance from	People Served by
Site (miles)	Private Wells
0 - 2	0
2 - 3	65
3 - 4	270
Total:	335

The nearest private domestic well is located about 2.18 miles southwest of the site about 80 feet from Gainsborough Road in Willerburn Acres. 4,8

There are no municipal wells or well systems within a four mile radius of the site. The Wellhead Protection Area (WHPA) for a municipal well located in non-karst terrain is currently defined as a two mile distance from the well. If any of this distance overlaps the four mile radius for the site, the well is considered to be in a WHPA. Based on this definition, there are no WHPAs near the MPWC site.⁵

5.2 SURFACE WATER USES

The surface water pathway for the MPWC site, from the probable point of entry (ppe) to the 15-mile terminus, is along Rock Creek in Montgomery County, Maryland and Washington, D.C. The Creek is estimated to flow at a rate of 10-100 cfs.²¹

Rock Creek is considered to be a fishery. Although it is not stocked for recreational fishing, some fishing is known to occur. 19,20

Wetlands are located along the entire surface water pathway. The total wetlands frontage is estimated to be 16.8 stream miles. Of this total, 15 stream miles are riverine, open water wetlands. The remaining 1.8 stream miles of frontage are palustrine forested wetlands that occur in small segments at various locations. The area of Rock Creek in Washington, D.C. is a National Park. No other sensitive environments are known to be present on the pathway. However, there is a study being done to determine the presence of threatened macroinvertebrates in the Creek in Washington, D.C.²⁰

There are no surface water intakes located between the ppe and the 15-mile terminus of the pathway.

5.3 NEARBY POPULATIONS

The MPWC site property is situated in the southeastern corner of Rockville, Maryland at 2355 Lewis Avenue, which is a predominantly residential avenue. The area in the vicinity of the site is residential, commercial, and industrial.

The Company employs less than 100 workers at the Rockville location, all of whom work on one shift. The nearest occupied building to any SWMU at the site is the manufacturing plant.

There are six homes within 200 feet of the eastern perimeter of SWMU4 (Figure 3). No schools or daycare centers are known to be present within 200 feet of any SWMU.

There are approximately 153,223 persons within a four mile radius of the site, excluding the MPWC employees. 6,7,24 This population is estimated to be distributed as follows:

Net Population Estimate

Distance of Ring	Population
from Site (miles)	(persons)
0 - 1/4	589
1/4 - 1/2	1,874
1/2 - 1	4,105
1 - 2	21,480
2 - 3	51,220
3 - 4	73,955
Total:	153,223



This population estimate was derived by house counts and urban area estimates from USGS Topographic Maps. The house count contribution for the estimate was obtained by multiplying the number of houses by a county average of 2.6 persons per household and a 30.74% increase in the population of Montgomery County from 1980 to 1990. The urban area contribution was obtained by multiplying the area of each distance ring in square miles by the percent of the ring covered by urban shading and an average of 5,000 persons per square mile. The number of students attending Twinbrook Elementary School (650) was supplied by the school. This is the only school located within one-half mile of the MPWC site.

There are no terrestrial sensitive environments onsite, and no wetlands within one-half mile of the site.

There are no known records of significant releases of hazardous wastes to the air.

6.0 SITE VISITS

6.1 PERSONS CONTACTED

Mr. Shri Kansal, Chief Chemist

Ms. Karen Glantschnig, Environmental Safety & Health Coordinator

Mr. Malcolm Allison, Product Executive

Mr. Gordon Allison, Vice President

McCormick Paint Works Company, Inc. 2355 Lewis Avenue Rockville, Maryland 20851 (301)770-3235

- 43404 - 177074

6.2 SITE OBSERVATIONS

On October 25, 1991, Ms. Shichin Tzeng and Mr. Richard Grills of the CERCLA Site Assessment/Pre-Remedial Division of MDE-HSWMA visited the MPWC site to gather information for this EPI-PA. Ms. Tzeng and Mr. Grills met with Mr. Shri Kansal, Ms. Karen Glantschnig, and Mr. Malcolm Allison who represented the MPWC (Section 6.1). The MPWC representatives explained their manufacturing processes, waste storage and handling procedures, and recycling practices.

Hazardous wastes consisting of spent solvents (mineral spirits) and paint sludges are produced during the cleaning of the paint mixing tanks. The spent solvent and sludge are separated and recycled through different manufacturing processes to produce a variety of paints and stains.

The plant also recycles the dust of titanium dioxide and clay, which is generated during the manufacture of paint.

Three Solid Waste Management Units (SWMUs) were identified. These are the drum storage yard, the satellite accumulation area for spent solvents in the manufacturing plant, and Warehouse 3, which includes the recycled solvent storage area. During the site visit, nine drums of oil-based paint were incorrectly stored in the recycled solvent storage area.

The surface water runoff route from the site is northeast toward Rock Creek. The entire site, except for the drum storage yard, is paved with concrete or asphalt, and is partially fenced. No stained soil was observed.

08101

A second site visit was conducted on March 23, 1992, by Ms. Ginny Sells, MDE/HSWMA, CERCLA Pre-Remedial Division. A meeting was held with Mr. Shri Kansal, Mr. Malcolm Allison, Ms. Karen Glantschnig, and Mr. Gordon Allison of the MPWC. The purpose of the EPI-PA was explained to the representatives of the MPWC. Additional information needed for the report was gathered, including the size of the site, whether the underground tanks had ever been inspected, if any major spills had ever occurred at the site, the locations of the former spent solvent storage areas in the drum storage yard (SWMU2) and the fenced open yard and parking lot (SWMU4), and the date the MPWC began leasing Warehouse 3. Mr. Shri Kansal and Mr. Malcolm Allison accompanied Ms. Sells on a tour of the entire site. All SWMUs were observed, and photographs of the SWMUs, the major structures of the site, and the surrounding area were taken.



7.0 CONCLUSIONS

The MPWC site includes a paint manufacturing plant that has been operating from 1967 to the present. The Company makes 90-93% water-based paint and 7-10% oil/solvent-based paint.

Hazardous wastes generated consist of spent solvents and paint sludges which are produced during cleaning of the oil/solvent-based paint mixing tanks with mineral spirits.

Throughout most of the Company's operating history, the spent solvent was separated from the sludge and reused in paint manufacturing processes. From 1983-1990, all of the spent sludges were solidified and transported as hazardous waste flammable material to an approved disposal facility; some spent solvent that was not reusable was also shipped off-site as wells. Currently, the main hazardous wastes kept on-site are 3-55 gallon drums of spent solvents/sludges (see SWMU1 below) which are eventually recycled to produce paint products.

Four Solid Waste Management Units (SWMUs) were identified at the site: (1) Satellite Accumulation Area for spent solvents/sludges in the manufacturing plant; (2) Drum Storage Yard where spent solvents/sludges were stored through 1990; (3) Warehouse 3, where spent solvents/sludges were stored from 1978-1990, which also includes the recycled solvent storage area built in 1991; and (4) The Fenced Open Yard and Parking Lot, where

drums of hazardous wastes were formerly temporarily stored before off-site shipment.

Titanium dioxide and clay dust, which is not a CERCLA or RCRA-regulated waste but is potentially toxic, is produced during paint manufacture. This dust is kept in the Drum Storage Yard (SWMU2) in 3-55 gallon drums and eventually reused to make more paint.

Also located in SWMU2 are three underground storage tanks that contain mineral spirits, ester alcohol, or ethylene glycol. These tanks were installed in 1967 and have never been inspected. Therefore, their condition is perhaps unknown. The MPWC plans to excavate these tanks and replace them in 1992.

Potable water for the MPWC site, and for 152,888 of the 153,223 people within a four mile radius of the site is supplied by two municipal systems that draw water from the Potomac and Patuxent Rivers. The remaining 335 people obtain drinking water from 129 private domestic wells located over two miles from the site.

The surface water runoff route from the site is northeast to Rock Creek, located about 0.85 mile away. The entire 15-mile surface water pathway is along Rock Creek in Maryland and the

District of Columbia (DC). About 1.8 stream miles of palustrine forested wetlands frontage are scattered along the pathway, and the area of Rock Creek in D.C. is a National Park. Rock Creek flows at 10-100 cfs, and is a fishery.

There are six homes located within 200 feet of the eastern perimeter of SWMU-4 on Lewis Avenue. However, this SWMU is paved with concrete, is not suspected of being contaminated, and has not been used as a temporary storage area for hazardous waste since 1990. No schools or daycare centers are known to be present within 200 feet of any SWMU.

Access to the property is limited by fences along the western and northern perimeters, the gate to SWMU4, which, along with all buildings on-site, is locked after business hours, and a 24-hour alarm system. This, plus the fact that nearly all hazardous wastes are currently kept in the manufacturing plant, make it very unlikely that nearby residents would come into contact with any areas of potential contamination under normal circumstances. The people most likely to be exposed are the plant workers who transport spent solvents/sludges to SWMU-1. However, the MPWC has an Environmental Safety and Health Coordinator, a Contingency Plan, and training for handling hazardous wastes.

No major spills or releases of hazardous wastes are known to have occurred at the MPWC. This, coupled with the past and present waste handling, storage, and disposal practices, have reduced the potential for a significant release of hazardous waste to the environment during the Company's operating history.



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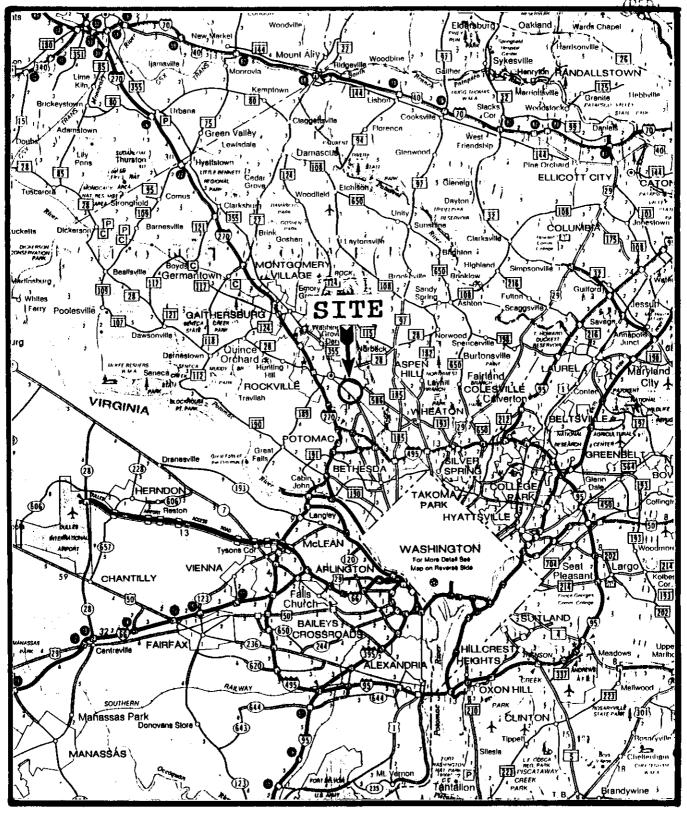
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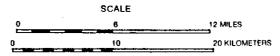
9.0 FIGURES

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REGIONAL MAP

FIGURE 1

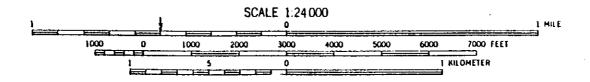




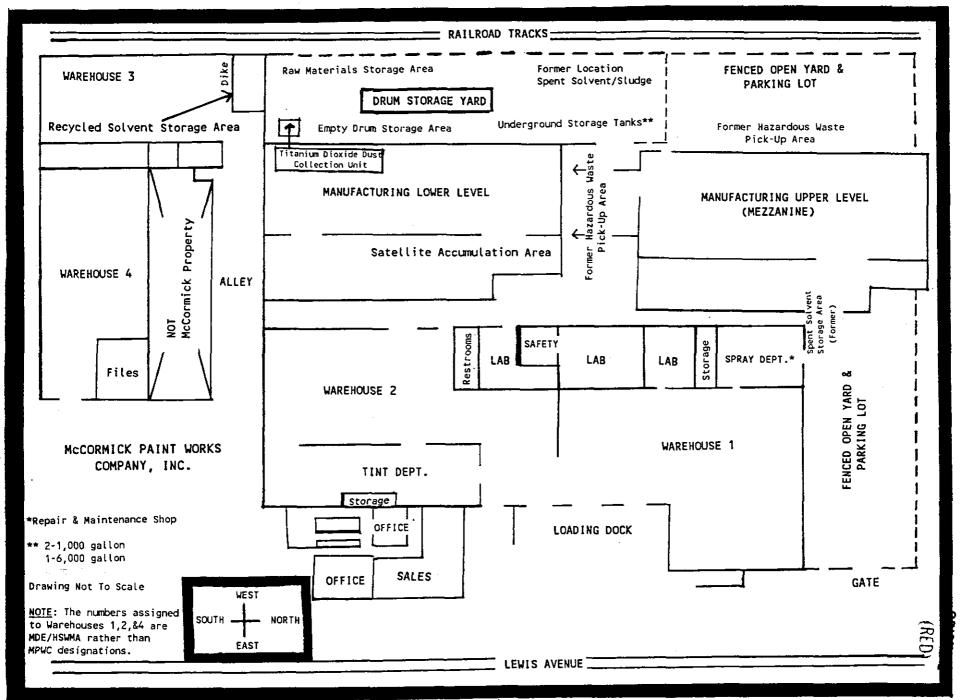
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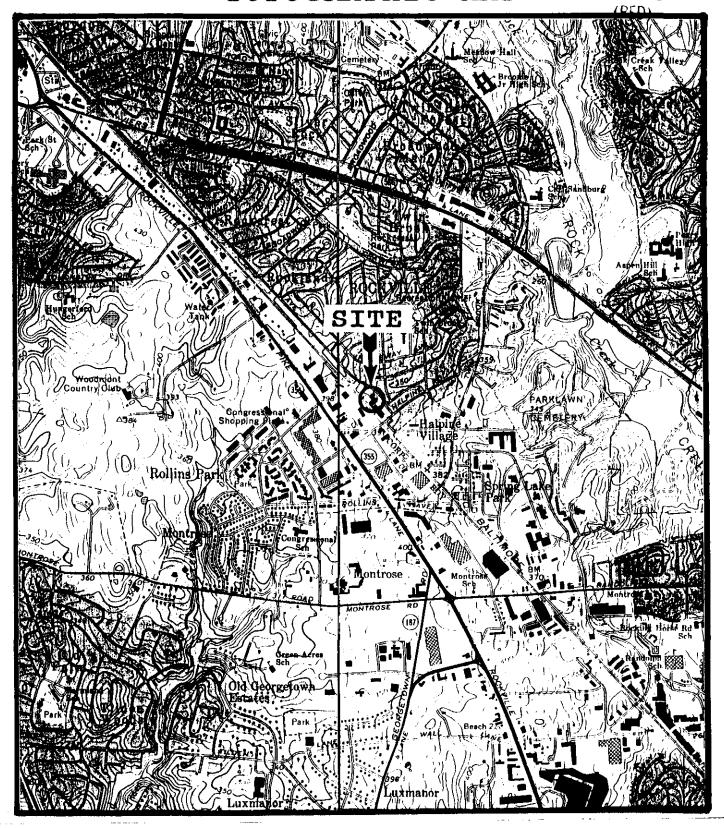
STREET MAP

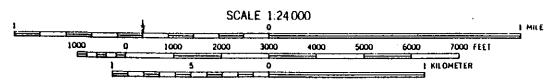




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CONTOUR INTERVAL 20 FEET NATIONAL GEODETIC VERTICAL DATUM OF 1929



LEGEND:

Qal - Alluvium

Was - Wissahlckon Fm.

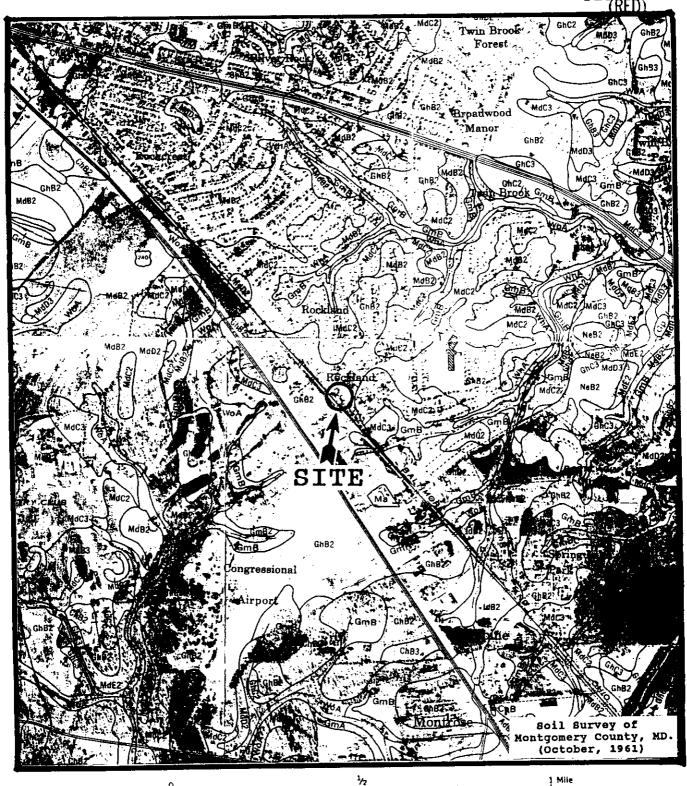
Waso- Wissahickon Fm. (Oligaciase - Mica Facies)

Sf - Sykesville Fm.

t - Tonalite with Inclusions

b - Undifferentiated Basic Igneous Rocks

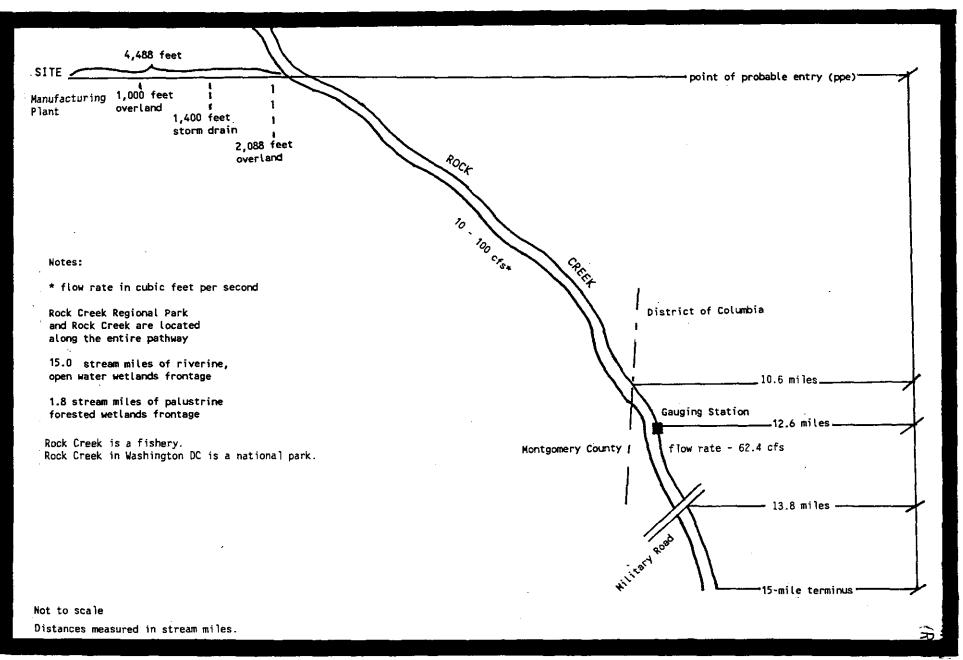
SOIL MAP



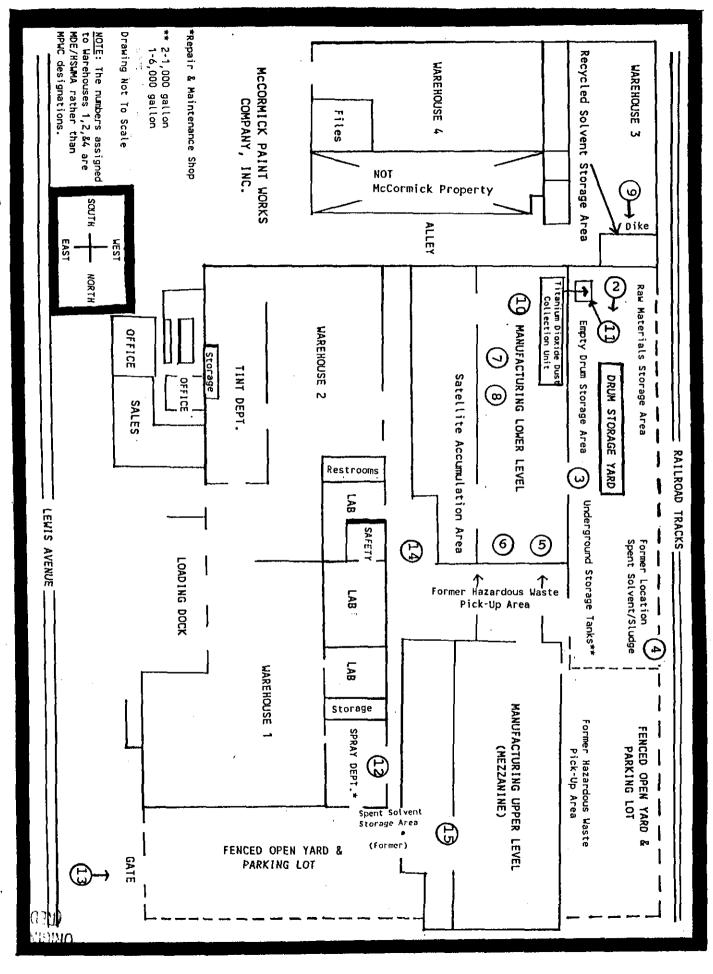
LEGEND:

GhB2-Glenelg Silt Loam , 3-8% Slope , Moderately Eroded GmB - Glenville Silt Loam , 3-8% Slope MdB2-Manor Silt Loam , 3-8% Slope , Moderately Eroded MdC2-Manor Silt Loam , 8-15% Slope , Moderately Eroded MdC3-Manor Silt Loam , 8-15% Slope , Severely Eroded

1



10.0 PHOTOGRAPHS





PHOTOGRAPH LOCATION MAP

EPA REGION III SUPERFUND DOCUMENT MANAGEMENT SYSTEM

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IMAGERY COVER SHEET UNSCANNABLE ITEM

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OPERABLE UNIT
REPORT OR DOCUMENT TITLE Preliminary Assessment DATE OF DOCUMENT 1- APRIL-1992 DESCRIPTION OF IMAGERY Photo Log
NUMBER AND TYPE OF IMAGERY ITEM(S) Photo log

APPENDIX A

SITE OWNERSHIP HISTORY MD-398

On March 1, 1966, T.P. McCormick and Thomas P. McCormick purchased the property from the Halpine Development Corporation (Liber 3476 Folio 88 Book 88 Platt 9440).

On February 20, 1961, the Halpine Development Corporation purchased the property from Robert A. Pugh and his wife Janice (Liber 2823 Folio 125 Book 50 Platt 3870).

On April 21, 1959, Robert A. Pugh and his wife Janice purchased the property from Lawrence L. Levin and his wife Regina Levin (Liber 2614 Folio 131).

Prior to T.P. McCormick buying the property in 1966 the said property was woodland.

Prepared by Mr. James Freeman MDE/HSWMA CERCLA Pre-Remedial Division

APPENDIX B

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EXON COMPANY, U.S.A. A DIVISION OF EXXON CORPORATION

DATE ISSUED: SUPERSEDES DATE

MATERIAL SAFETY DATA SHEET

EXXON COMPANY, U.S.A.

P.O. BOX 2180

HOUSTON, TX 77252-2180

IDENTIFICATION AND EMERGENCY INFORMATION

PRODUCT NAME 627 SOLVĖNT

PRODUCT CODE 131031 - 00627

CHEMICAL NAME Patroleum Solvent CAS NUMBER 8052-41-3

PRODUCT APPEARANCE AND ODOR Clear water-white liquid Mineral spirits odor

EMERGENCY TELEPHONE NUMBER (713) 656-3424

Kegulas Monera

COMPONENTS AND HAZARD INFORMATION

COMPONENTS

CAS NG. OF COMPONENTS **APPROXIMATE**

CONCENTRATION

This product can be defined as:

Stoddard Solvent

8052-41-3

100%

It consists predominantly of C7-C10 hydrocardons, .

This product contains:

C7-C10 saturated hydrocarbons

Toluece Xvlene

Mixture 108-88-3 1330-20-7 Approximately 83% Approximately 0.4%

Approximately 0.8%

Ethylbenzene Ca+ Aromatics

100-41-4 Mixture

Approximately 0.2% Approximately 14%

See Section E for Health and Hazard Information.

See Section H for additional Environmental Information.

HAZARDOUS MATERIALS IDENTIFICATION SYSTEM (HMIS) Health Flammability React: wity

BASIS

Recommended by Exxon

EXPOSURE LIMIT FOR TOTAL PRODUCT

100 ppm (525 mg/m3) for an 8-hour workday

Recommended by the American Conference of Governmental Industrial Hygrenists (ACGIH) for Steddard Solvent

500 ppm 8-hour TWA

OSHA Regulation 29 CFR 1910,1000

C. PRIMARY ROUTES OF ENTRY AND EMERGENCY AND FIRST AID PROCEDURES

If splashed into the eyes, flush with clear water for 15 minutes or until irritation subsides. If irritation persists, call a physician.

SKIN

In case of skin contact, remove any contaminated clothing and wash skin thoroughly with some and water.

945-0277MWH001I

72-62-7820-01

KATERIAL SAFETY DATA SHEET

ASSISSIE. Marian Maria

P.O. 20X 2 COLUMBUS, OHIO 482 (614) 893-3030

24-nour Emergency Telephone 1 (800) 274 5327 1-80 - **100 (177**)

603075

ETHYLENE GLYCOL

(RED) Page:

والشافوا ومأفيسا التدائد السابات

THIS MSOS COMPLIES MITH 29 CFR 1910.1200 (THE HAZARD CONTUNICATION STANDARD)

Product Name: ETHYLENE GLYCOL

MCCORMICK PAINT WORKS CO. 2355 LEWIS AVENUE MD 2 MD 20857 05 50 071 5761280-

Data Sheet No: 0000003-006 Prepared: 05/31/89 Supersedes: 12/22/88 Supersedes:

PROCUCT: 3370000 INVOICE: 850207 INVOICE DATE: 01/26/90 TO: SAME

ATTN: PLANT MGR./SAFETY DIR.

A PARTY OF THE WASHINGTON METERODUCT AND ENTITIES CAUTION OF THE WASHINGTON OF THE W

General or Generic ID: GLYCOL

ECT Hazard Classification: NOT APPLICABLE

的影響的學術學的學學所以所以於中國ECITEON EDEL-DOMPONENTIS和中心學學的學術學的學術學的學術學

MTP AND OSHA CARCINOGENS AND CHEMICALS SUBJECT TO THE REPORT-OF SARA TITLE III SECTION 313 ARE IDENTIFIED IN THIS SECTION. SEE DEFINITION PAGE FOR CLARIFICATION

INGREDIENT

ETHYLENE GLYCOL CAS #: 107-21-1

2 (by MT)

PEL

TLV

100 50 PPH - CEILING 50 PPM - CEILING

1 1) THIS CHEMICAL IS SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF SARA TITLE 111.

for PRODUCT **Bailina Point** 401.00 Deg F 205.00 Deg C 760.00 == sg a 0.10 mm 68.00 Deg 20.00 Deg for PRODUCT Vapor Pressure Specific Vapor Density AIR = 1 2.2 1.115 68.00 Deg 20.00 Deg 1.115 Specific Gravity Percent Volatiles NOT APPLICABLE IN-BUTYL 4CETATE = 1) Evaporation Rate < 1.00

SERVED BUILDING AND AND NATION FOR MAKE BUILDING AND PARKET AND LABOUR TO A

FLASH POINTLICC

232.0 Deg F

111.1 Deg C)

EXPLOSIVE LIMIT

1 PRODUCT 1

LOWER -3.2% UPPER - 15.3%

EXTINGUISHING MEDIA: WATER FOG OR CARBON DIOXIDE OR DRY CHEMICAL

HAZARDOUS DECOMPOSITION PRODUCTS: MAY FORM TOXIC MATERIALS:, CARBON DIOXIDE AND CARBON MONOXIDE, ETC.

FIREFIGHTING PROCEDURES: HEAR SELF-TONTAINED BREATHING APPARATUS WITH A FULL FACEPIECE OPERATED IN THE POSITIVE PRESSURE DEMAND MODE WHEN FIGHTING FIRES.

WATER OR FOAM MAY CAUSE FROTHING WHICH CAN BE VICLENT AND POSSIBLY ENDANGER THE LIFE OF THE FIREFIGHTEX, ESPECIALLY IF SPRAYED INTO CONTAINERS OF HOT, BURNING LIQUID.

SPECIAL FIRE & EXPLOSION HAZARDS: MEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM LEVEN EMPTY) BECAUSE PRODUCT LEVEN JUST RESIDUE) CAN IGNITE EXPLOSIVELY.

NEPA CODES:

HEALTH- 1

FLAMMABILITY- 1

REACTIVITY- 0

PERMISSIBLE EXPOSURE LEVEL

PPM - CEILING

THRESHOLD LIMIT VALUE

50

PPM - CEILING

EFFECTS OF ACUTE OVEREXPOSURE: FOR PRODUCT

EYES - CAN CAUSE IRRITATION. SKIN - CAN CAUSE SLIGHT IRRITATION. BREATHING - EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL AND RESPIRATORY IRRITATION. SMALLOHING - CAN CAUSE GASTROINTESTINAL IRRITATION, MALSEA, VOMITING, AND DIARRHEA.

FIRST AID:

IF ON SKIN: THOROUGHLY MASH EXPOSED AREA MITH SOAP AND MATER. REMOVE CONTAMINATED CLOTHING. LAUNDER CONTAMINATED CLOTHING BEFORE RE-USE.

COPYRIGHT 1989

CONTINUED ON PAGE: 2

MATERIAL SAFETY DATA SHEET

BE EASTMAN CHEMICAL PRODUCTS, INC. EASTMAN KODAK COMPANY Kingsport, Tennessee 37662

For Health Hazard Information, Call: (615) 229-6094

For Other Information, Call Your Eastman Representative

Eastman Operator: (615) 229-2000 Date of Preparation 05-19-89

SECTION I. IDENTIFICATION

-- Name:

"TEXANOL" Ester-Alcohol

- Synchyms: PM 2404; 2,2,4-Trimethyl-1,3-pentanedici monoisobutyrate

-- Formula: C12H24O3

-- Molecular Weight: 216.36

SECTION II. COMPONENT AND PRECAUTIONARY DATA

Approx COMPONENTS: Kodak No Weight % CAS Reg No

2,2,4-Trimethyl-1,3-pentanediol 100 25265-77-4 000701 monoisobutyrate

PRECAUTIONARY LABEL STATEMENTS:

LCW HAZARD FOR USUAL INDUSTRIAL HANDLING

FOR MANUFACTURING USE ONLY

SECTION III. PHYSICAL DATA

- -- Appearance and Odor: Clear liquid, mild characteristic odor.
- -- Boiling Point: 244°C (471°F). -- Melting Point: -50°C (-58°F).
- -- Specific Gravity at 20/20°C (water = 1): 0.95.
- -- Viscosity at 20°C (68°F): 13.5 cP.
- -- Vapor Pressure: 0.02 mm Hg at 38°C (100°F), estimated.
- -- Percent Volatile by Volume: 100%.
- -- Vapor Density (Air = 1): 7.45.
- -- Evaporation Rate (n-butyl acetate = 1): 0.002.
- -- Solubility in Water: 0.5-0.8 g/L (negligible).

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

- -- Flash Point: 120°C (248°F); Method Used: Cleveland Open Cup.
- -- Autoignition Temperature: 393°C (740°F); Method Used: ASTM D 2155.
- -- Flammable Limits: LEL 0.62% at 149°C
 - UEL 4.24% at 201°C
- -- Extinguishing Agent: Water Spray, Dry Chemical, Carbon Dioxide, or Foam. MSDS-10,528A-1 (05-89) Replaces 04-89 Edition

APPENDIX C

**

OR SIT	FORE COPYING ENTER: E NAME	MCCORMICK 2355 LEWIS ROCKVILLE	H SITE IDENTIFICATE PAINT WORKS S AVENUE , MARYLAND 20	INC		FORM	1990 7	RYLAND DEPA F THE ENVIRO Hazardous Wa DENTIFICATIO CERTIFICATIO	NMENT ste Report N AND
						IC		∢ RE	D)
INST	RUCTIONS	Read the de	tailed instructions b	eginning on pag	1990 e 7 of the	łazardous W	/aste Report t	booklet before comp	leting this form.
SEC. I	•		ess. Complete items	•			8, D, E, F, G	, and Hill same as la	bel; if
A. EPA IO N Same as	lo. Iabel□ or—	(MiDiDi(0 10 13 2 4 181	2	Sile/company nam		MCCORMICE	K PAINT WORKS	INC
C. Has the	site name associat	ed with this EPA ID ch	anged since 1989	1 Yes. 1 2 No					-
D, Street na Same as or	label 🔲	not applicable, enter	industnal park, building n	ame or other physical	location description.	2355	LEWIS AV	/ENUE	
	n, village, etc. Ilabet 🗆 RC	CKVILLE	F. County MONTGO	MERY	G. State Same a	s label 🛘 📗	Zip Code Same as label [[2]0]] 8 5 1 –	L!
SEC. II-	Mailing addre	ess of site. Instru	ction page 7.						
A, is the m	ailing address the s	ame as the location s		✓ 1 Y+s {SKIP TO✓ 2 No {COMP					
B. Number	and street name of	mailing address					· · · · · · · · · · · · · · · · · · ·		
C. City, tow	n, village, etc.				D. State	E	Zip Code	<u>.,</u>	
							<u> </u>		<u> </u>
SEC. III	Name, title, a	and telephone nu	imber of the person	who should be o	contacted if que:	stions arise (egarding this	report, Instruction	page 7.
AL	int: Lasi name LISON NSAL	G	ist name ORDON SHRT	м.i. В	B. Title EXEC. V.I CHIEF CHI	₽. }	Telephone		3 2 , 3, 5, N/A, ,
SEC. IV	the services	indard Industrial rendered at the s he site, Instructio	ite's physical location	Code that descr on. Enter more th	ibes the principa nan one SIC Coo	il products, de anly il no	group of proc one industry	ducts, produced or d description includes	istributed, or the combined
	<u>[2,8,5</u>	1	N/A	ــــــــــــــــــــــــــــــــــــــ	c	1/A1 1 1		D. <u>(Ν/Α</u> ,	
SEC. V	documents, ar submitted info the possibility	nd that based on trmation is true, a of fine and impri	my inquiry of those accurate, and comp	individuals imm	rediately respon	sible for obt	aining the inf	d in this and all attac ormation, I believe t bmitting false inform	hat the
Number Frim IC	101015	nitled Form G	M 1010121	Fолп	WR [0]0]1	<u></u>	Form f	°s (<u>0 () () </u>	orm 01 <u>,0,0,1,</u>
	ANTSCHNIG		irst name AREN			M.I. C	. tale SAFETY &	HEALTH COOR	OINATOR
Firmu	far	- a	War to	chree.	1	E	Date of signatur	° <u>(03.</u> <u>(25.)</u> мо. оач	9.11. YR
) i			(<i>)</i>			Page 1 of	7

Sec. VI Generator Status		
AT 990 generation (CHECK ONE BOX BELOW) Instruction page 8 1 No (CONTINUE TO BOX B) 2 LOG 3 SQG (SKIP TO SEC. VII) 4 CESOG	B. Reason for not generating (CHECK ALL 7 Page 10 N/A 1 Never generated 2 Out of business 3 Only excluded or delisted waste	THAT APPLY) 4 Only non-hazardous waste 5 Periodic or occas in table enerator Waste minimization activity 7 Other (SPECIFY IN COMMENTS)
Sec. VII On-Site Waste Managemen	t Status	-
A. Storage Instruction page 11	B. RCRA treatment, recycling, or disposal Page 11	C. RCRA-exempt treatment, recycling, or disposal Page 12
Sec. VIII Waste Minimization Activity	during ¹⁹⁸⁹ or 1990	
A. Did this site begin or expand a source reduction activity during 1989 or 1990 Instruction page 12 1 Yes 2 No	B. Did this site begin or expand a recycling activity during 1989 or 1990 Page 13 1 Yes 2 No	C. Did this site conduct a source reduction or recycling opportunity assessment during 1989 or 1990 Page 13 1 Yes 2 No
03 Lack of technical information on source	luction activities, e reduction equipment or implement new source e reduction techniques applicable to the specifi easible: cost savings in waste management or ine as a result of source reduction.	e reduction practices.
E. What factors have limited this site from initiatin (CHECK ALL THAT APPLY) Page 13 301 No factors have limited new recycling a loss insufficient capital to install new recycling or implement new recycling practices. 303 Lack of technical information on recycling applicable to this site's specific production applicable to this site's specific production will recapital investment. 304 Recycling not economically feasible: concern that product quality may decling of recycling. 305 Requirements to manifest wastes inhib site for recycling.	ictivities. Ing equipment Ing techniques Ition processes. Ing techniques Ition processes. Ing techniques Ition processes. Ing techniques Ing techniqu	lity provisions inhibit shipments off site for recycling, tations of product processes inhibit shipments off site ations of production processes inhibit on-site recycling, recycling inhibit recycling, and the off-site recycling facilities. Intify a market for recyclable materials. FY IN COMMENTS)
Comments:		

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: MCCORMICK PAINT WORKS 2355 LEWIS AVENUE ROCKVILLE, MARYLAND 20851	MARYLAND DEPARTMENT OF THE ENVIRONMENT 1990 Hazardous Waste Report					
EPAID NO. [M,D,D,0,0,3,2,4,8,2,7,5]	FORM (RED) WASTE GENERATION AND MANAGEMENT					
INSTRUCTIONS: Read the detailed instructions beginning on page 14	of th 1990 Hazardous Waste Report booklet before completing this form.					
Sec. A Waste description WASTE FLAMMABLE LIQUID N.O. Instruction Page 15 UN 1993 RQ - WASH MINERAL S	S. FLAMMABLE LIQUID SPIRIT					
B. EPA hazardous weste code Page 15 D_0_0_1 N/A N/A N/A	C. State hazardous waste code Page 16 Ny A					
D. SIC code Page 18 2 - 8 - 5 - 1 A - 0.9	F. Form code Page 18 (3. Origin Page 18 (3. Origin Page 18 (4. Origin Page 18 (5. Origin Page 18 (6. Origin Page 18 (7. Origin Page 18 (8. Origin Page 18 (9.					
H. TRI constituent Page 17						
II Instruction Page 17 Page 17	D. Density Page 18 E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW7 Page 18 5 1 0 6 = 7 0 1 Yes (CONTINUE TO SYSTEM 1) X 1 lbs/gal 2 sg					
SYSTEM 1 System type Page 18 M 1 1 N/A L 1 1 1 1 1 N/A	SYSTEM 1 System type System type Page 18 Page 18 SYSTEM 2 System type Cuantity treated, disposed or recycled in 1990 Page 18 Page 18					
Sec. A. Was this waste shipped off site? 1 Yes (CONTINUE TO BOX B) 2 No (SKIP TO SEC. M)						
Site B. EPA ID No. of facility to which waste was shipped Page 19 LV, A, D, O, 9, 8, 4, 4, 3, 4, 4, 3, 4, 4, 3, 4, 1, 3, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	D. Total quantity shipped in 1990 Page 19 L 1 151910101					
Site 2 Lillin N/A	MINYA LILINYAL					
Sec. A. Weste minimization results in 1990 X1 Yee (CONTINUE TO BOX B) IV Instruction Page 20 2 No (THIS FORM IS COMPLETE)						
B. Activity C. Other effects D. Quantity recycled in reservoise to new activities E. Activity/Production Index F. Source Reduction Quantity Page 21 Page 22						
Comments: Section 1 (F) PAINT TANK CLEANING IS THE PRINCIPAL SOURCE OF GENERATED WASTE.						
	Page 3 of 7					

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME

MCCORMICK PAIN'T WORKS COMPANY

2355 LEWIS AVENUE

ROCKVILLE, MARYLAND 20851

EPA ID NO.

M, D, D, O, O, 3, 2, 4, 8, 2, 7, 5



1990 Hazardous Waste Report

MARYLAND DEPARTMENT

OF THE ENVIRONMENT

(REU)

FORM GM

WASTE GENERATION AND MANAGEMENT

Page 4

of

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of th 1990 Hazardous Waste Report booklet before completing this form.				
Sec. A Waste description waste Flammable Sol EXTENDERS (CLAY), PIGMENT	ID N.O.S. 9189, OIL PAIN CONTAIN IGNITABLE MINERA	TO WASTE SOLIDIFIED WITH AL SPIRIT, ALKYD RESIN AND		
B, EPA hazardous waste code Page 15	C. State hazardous weste cod Page 16	· N/A11.1.		
D. SIC code Page 16 E. Source code Page 16 [2-18-5-1] [A-10	F. Form code Page 16	G. Origin Page 18 Code [] 1 9 Bystem type [M N/A]		
H. TRI constituent Page 17 L CAS numbers Page 17 . L L L L L L L L L L L L L L L L L L	1. [N/A] 1- [] - []			
Sec. A Quantity generated in 1989 B. Quantity generated in 1 Page 17 L 1 1 5 8 5 0 0 L 1 9 11	Page 18 Page 18			
SYSTEM 1 System type Page 16 MIN/A N/A SYSTEM 2 System type Page 18 MIN/A MIN/A SYSTEM 2 System type Page 18 MIN/A MIN/A MIN/A N/A N/A N/A N/A N/A N/A N/A				
Sec. A. Was this westershipped off site?				
Site 1 B. EPA ID No. of facility to which waste was shipped instruction Page 19 [O1 H1 D1 O1 41 51 21 41 31 71 01 61] Site 2 [N/A] 1 [C. System type Page 19 [M1 1 1 1]	D. Total quantity shipped in 1990 Page 19 L + + + + + 9+1+0+0+0		
Sec. A. Weste minimization results in 1990 (2X.1 Yee (CONTINUE TO BOX B) IV Instruction Page 20 2 No (THIS FORM IS COMPLETE)				
Page 21 Page 21 Page 21	d in passe due to new activities E. Activity/Produ	Page 22		
W1111 W136 □1 Y (NVA) 1 W1612 W181 Ø2 No	Nv/At•	USED 20 DRUMS (each drum 400#)		
Comments: Section 1 (F) DRY PAINT SE	KINS, NONUSABLE OIL PAIN	T WASTE		

	MCCORMICK PAINT W			
	2355 LEWIS AVENUE ROCKVILLE, MARYLA	ND 20851 1990 Hazardous Waste Generation		
}		FORM and Shipment Report		
EPA ID NO.	4 D ₁ D ₁ O ₁ O ₁ 3, 2, 4, 8	OFF-SITE IDENTIFICATION		
WHO MUST COM	PLETE THIS FORM?	Form OI must be completed by every site that shipped hazardous waste off site and every site that received hazardous waste from off site during 1990		
[Mark X if you are not required to complete Form OI.		
	INSTRUCTIONS:	Please read the detailed instructions beginning on page 26A ⁻ 1990. Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.		
		Complete A through E for each off-site Installation to which you shipped waste or from which you received waste during 1990		
[Complete A through D for every transporter you used during the reporting year. Throughout this form enter "DK" if the information requested is not known or is not available; enter		
		NA if the information requested is not applicable. Make and complete additional copies of this form if you need to identify more than four off-site installations or transporters.		
Site A EPA IO No. of off-s instruction page 2	de installation or transporter	8. Name of off-site installation of transporter Page 2 . ENS/J DOCADE CEDIFICEC OF OUTO TAKE		
· · · · · · · · · · · · · · · · · · ·	te installation of transporter 6 A 1 5 2 4 3 7 0 6	26A ENVINOSATE SERVICES OF ONTO INC. 1 (419) 726-1521		
C. Site type code	D. She relationship code Page 263	E. Address of off-site installation Page 26B 876 OTTER CREEK ROAD		
E	LDI	City OREGON State O, H 200 4, 3, 6, 1, 6, - D.K.		
Site A EPAID No. of off-anishing page 2	te installation or transporter	B. Name of off-side installation or transporter Page 7 / A		
C. Sile type coos	D. Sae restionarily code	26 A DART TRUCKING COMPANY E. Address of off-side Installation		
Page 26B	Page 24	Page 26B N/A		
T	LDI	City N/A State [N/A] Zip Code [N/A]		
Site A EPA ID No. of off-a histruction page	76 A 5 8 4 4 3 4 4 3	B. Name of off-site installation of transporter Page 26 A OLDOVER CORPORATION 1 (804) 581-3226		
C. Site type code	D. Site relationship code	E. Address of off-site installation Page 1 (1)		
¹²⁹ 26B	Page 26B	Street STATE ROAD 052 P.O. BOX 68		
LEI .	LDI	Cry ARVONIA State V.A Code [213101014] - [D1K]		
Site A EPA IO No. of off-sr instruction page 2	10 (131a)(a)(0) 0) (131a)(2)(3)(4)(3)(6)	B. Name of off-site installation of transporter Page 26 A OLDOVER CORPORATION		
C. Site bion code	D. Ste relationship code	E. Address of off-sile installation		
Page 26B	26B	Page 26B N/A Street		
ĽŢ	D	City N/A State N/A Code N/A		
Comments:				
NC	NE	!		
		Page 5 of _ 7		

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE

MDD003248275

MCCORMICK PAINT WORKS INC

2355 LEWIS AVE

ROCKVILLE MD 20851 ATTN: ALLISUN GORDON

EPA



FORM

IC

MARYLAND DEPARTMENT OF THE ENVIRONMENT

1989 Hazardous Waste Report GAIGINAL

IDENTIFICATION AND CERTIFICATION

Page 1 of

					<u> </u>		•	
INSTRUCTION	IS: Read the de	tailed instructio	ns beginning on p	age 7 of ti	ne 1989 Hazardous	Waste Report I	booklet before comp	leting this form.
	and location addre					4, B, D, E, F, G	, and H if same as la	bel; if
A. EPA ID No. Same as label 57 or -		<u> </u>	<u> </u>		npany name a labet 🗱 or			
C. Has the site name asso	ciated with this EPA IO ch	anged since 1987?	☐ 1 Yes ☑ 2 No					
D. Street name and numbe Came as label Of	r. If not applicable, enter	industnal park, buil	ding name or other phy:	ucal location	description,			
E. City, town, village, etc. Same as label Or		F. County MC	NTGOMERY		G. State Same as label ☑	H. Zip Code Same as label¶	ρ <u>- </u>	<u></u>
SEC. II Mailing ad	dress of site. Instru	iction page 7.						
A. Is the mailing address to	he same as the location a	ddiess?	Ø 1 Yes (SK	IP TO SEC. III				
包, Number and street nam	e of mailing address		n/a					
C. Cily, lown, village, etc.	n/a				n/a	E. Zip Code	ı/a 	<u> </u>
SEC. III Name, titl	e, and telephone n	umber of the po	erson who should	be contact	ed if questions aris	e regarding thi	s report. Instruction	page 7.
A. Please print: Last name		inst name ,	, M.I.	B. Tille		C. Telephone	·	
Allison	Gor	don	-	Exe	c. V.P.	1310	<u> </u>	- <u>3 2 3 5</u>
Kansal	Shr	i	В.	Chi	ef Chemist		Extension	ln la!
SEC. IV the service		site's physical l					ducts, produced or or description include	
A L 2 <u>1 8</u>	15,1,	в. <u>L N</u>	L_1 A L_1	c.	UNI IAI		o. N <u>! A'</u>	<u> </u>
SEC. V document submitted	s, and that based of	n my inquiry of accurate, and	those individuals i	mmediate	ly responsible for o	btaining the in	ed in this and all atta formation, I believe abmitting false infor	that the
A Number of form pages Form IC [1		ы <u>[0</u>]0 (1	٦	Form WFI	0.10.11.1	Form	es (<u>0 (0 (1</u>)	
II - Please pont: Lost nam	•	First name			M.I.	C. Tille		
Glant	schnig	<u>Karen</u>			A	Safety &	Health Dire	tor

Sec. VI	Generator Status		
· Instruction	(CONTINUE TO BOX B) G (SKIP TO SEC. VII)	B. Reason for not generating (CHECK Page 10 N/ 1 Never generated 2 Out of business 3 Only excluded or delisted w	A Only non-hazardous waste D 5 Periodic or occasional generator
Sec. VII	On-Site Waste Management	Status	(RED)
A. Storage Instruction	page 11	B. RCRA treatment, recycling, or disportant Page 11	C. RCRA-exempt treatment, recycling, or disposal Page 12
	L3.J	L <u>1</u> }	[1]
Sec. VIII	Waste Minimization Activity d	uring 1988 or 1989	
	•	B. Did this site begin or expand a reconstructivity during 1988 or 1989? Page 13 1 Yes 2 No	C. Did this site conduct a source reduction or recycling population of population of population of page 13 1 Yes 2 No
(CHECK A Page 13 01 No 02 In: 03 La 04 Sc 05 Cc 06 Te	LL THAT APPLY) of factors have limited new source reduced in the source could be source to the source ck of technical information on source	reduction equipment or implement new reduction techniques applicable to the asible: cost savings in waste managem re as a result of source reduction.	source reduction practices.
(CHECK A Page 13 O1 No O2 In: O7 O3 La ap X 04 Re W: Ca X 05 Cd	ors have limited this site from initiating LL THAT APPLY) In factors have limited new recycling as sufficient capital to install new recycling implement new recycling practices. In the cycling of technical information on recyclicable to this site's specific product ecycling not economically feasible: coaste management or production will inpital investment. In pital investment. In product quality may decline recycling.	g equipment	al liability provisions inhibit shipments off site for recycling. al limitations of product processes inhibit shipments off site
	e for recycling.		

OR ENTER:

SITE NAME

McCormick Paint Works Company 2355 Lewis Avenue

Rockville, Maryland 20851

EPAID NO.

MIDIDIO1013121418121715



OF THE ENVIRONMENT

1989 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENTAL

Page 3 01 5

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.						
	Instruction Page 15 WASTE FEATURDED SOLID N.O.S. 9109, OIL PAINT WASTE SOLIDIFY WITH					
8. EPA hazardous weste code Page 15		C. State hazardous waste code Page 18				
(D) 0 1 1 (N(A)	LNALLI (NIALLI	INIAL L L L L	LNIALIII			
D. SIC code Page 18	E. Source code Page 16	F. Form code Page 10	G. Origin Page 16 Code 1			
21815111	1 <u>A 1 0,9 1</u>	1 <u>B 13 (1 19 1</u>	System type (M N A			
TRI constituent L CAS no Page 17 Page	umbers 17 1. [N A		┸┉┸┈┸┈╏			
2 1	<u> </u>					
Sec. A. Quantity generated in 1968 Instruction Page 17			ile weste treated, disposed or recycled on site charged to a sewer/POTW?			
<u> </u>	<u> </u>		Yes (CONTINUE TO SYSTEM 1) No (SKIP TO SEC. III)			
	System type System type Ouentity treated, disposed or recycled in 1989 Page 18 N/A Page 18 System type Ouentity treated, disposed or recycled in 1989 Page 18 N/A Page 18					
Sec. A. Was this waste shipped off site?	1 Yee (CONTINUE TO BOX B) C 2 No (SKIP TO SEC. M)					
Sit8 B. EPA IO No. of facility to which weate we Instruction Page 19	Page 19	D. Total quantity Page 19				
IQ1H1D101415121 Site N/A		M(1 1) L	<u> </u>			
Sec. A. Waste minimization results in 1969 IV Instruction Page 20	I					
B. Activity C. Other effec Page 21 Page 21	D. Quantity recycled in 1989 due to new Page 21	activities E. Activity/Production Index Page 21	. Source Reduction Quantity Page 22			
1W11141 1W2121 01 Y			NA			
W! W						
Comments: SECTION 1 (F) DRY PAINT SKINS, NONUSABLE OIL PAINT WASTE.						

OMB#: 2050-0024 Expires 12-31-89

BEFORE COPYING FORM, ATTACH SITE OR ENTER: SITE NAME MCCORMICK PAINT 2355 LEWIS ATTACH SITE OF A PAINT ROCKVILLE, MI EPAID NO. MID [D 10 10 13 12	WORKS INC VE D. 20851	FORM IC	MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION 1988 Hazardous Waste Concration and Shipment Report IDENTIFICATION AND CERTIFICATION	
WHO MUST COMPLETE THIS FO	•	eted by every site that rec	· · ·	
INSTRUCTIO	ONS: Please read the detailed and Shipment Report In	instructions beginning on structions booklet before (page 8 of 1988 Hazardous Waste Generation completing this form.	
ĺ	Complete Sections I the	ough IV and Sections VI	through IX immediately. Complete Section V,	
<u> </u>	certification, after you he	we finished the full report	package.	
SEC. Site name and physical location which I. Mark X for items A, B, C, D, F, and G		**		
A. Ske/company name		S. EPA ID No.		
Same as label OCORMICK PAINT WORKS	S COMPANY	Of	M, D, D, O, O, 3, 2, 4, 8, 27,5	
C. Address number and street name of physical location • II			- 	
Same as label	. •	•		
□ → 2355 LEWIS AVENUE	·· ·····			
D. City, town, village, etc. Same as label	ounly	F. State Same as label	3. Zip Code Same as label	
	ONIGOMERY	α <u>M</u> D]	$\sim - 12_10_18_15_11_1 - 11_11_1$	
SEC. Mailing address of site. II. Mark [X] for A, B, C, and D if same as label; if different, enter corrections.				
A. Number and street name of mailing address Same as tabel		*		
B. City, town, village, etc.		C. State). Zip Code	
Same es labei (C)		Same as label	Same as label:	
01		α _ _	or ——	
SEC. Itt. Name, title, and telephone number of	of the person who should be cont	acted if questions arise re	garding this report.	
A. Please print: Last name First nam KANSAL SHRI		O. TAILO CHIEF CHEMIST	C. Telephone	
ALLISON GORD	1	EXEC VICE PRES	[3,0,1] $[7,7,0]$ = $[3,2,3,5]Extension [N/A]$	
SEC. IV. Enter the Standard Industrial Classification of the site. SIC codes are listed begin	al location. Enter more than one S	IC Code only if no one ind	roup of products, produced or distributed, or the ustry description includes the combined activities abook.	
A B.	[C.]		E. F.	
[2,8,5,1] NA	[N _i A _i]	NA	NA I	
SEC V. I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.				
A. Please print: Last name First name	me	M.i.	Title	
GLANTSCHNIG KAR	REN	A. (SAFETY & HEALTH DIRECTOR	
B. Signature	11/10		Date of signature	
Kener /	larschas		0 5 2 3 8 9 Mo. Day Yr.	
/ /		1	Page 1 of 10	

BEFORE COPYING OR ENTER: SITE NAME	2355 LEWIS AV	NT WORKS COMPANY		SOLID V A1 1988 Ha	AND HAZARDOUS AND VASTE MANAGEMENT DMINISTRATION
EPA ID NO.	ROCKVILLE, ME		FORM		d Shipment Report (RED) E GENERATION AND SHIPMENT
WHO MUST C	OMPLETE THIS FO	Mark if you are not required. Mark if you are not required. Please read the detailed Generation and Shipment Foundation and Shipment Foundation and Shipment Foundation and Shipped off site during 19 Complete Sections 1 throug known or is not available; expenses.	ring 1988 ed to complete Form to instructions beginning appart instructions bootscopy of this form 88 h fv. Throughout this ner "NA" if the informations are the information of the inf	GS. g on page 12 klet before compl for <u>each</u> hazardo form enter "DK" if	the information requested is not not applicable.
B. EPA hezardous waste of Page 12 D O O 1 D. SIC code Page 13	NA NA NA	ALLI NALLI	ole mineral s State hazardous waste cod Page 13 NA	pirit,alky	d resin and pigment
Sec. A. Organics Instruction Page Instruction Page Instruction Page Instruction Page Instruction Page Instruction Page Instruction Instruc	High 91	. — .	Page 18 High LL Low LL UOM L	Note LN1	F. Toxic Metals Page 16 Note A Metal High Low Yest 1
III instruction (ty hazardous wasts generated Pege 20 (4 5 5 0 0 sale on site on January 1, 198			C. UOM Page 21 P. Inaining on site on Dec	D. Density Page 21 [N_A] • [] [tbs/gal] sg ember 31, 1988
N Instruction	0, 4, 5, 2, 4, 3, 7	shipments mode Page 22 Page 22	D. Off-site T/S/D/R of Page 22	Pag	il quantily shipped pe 22 1
SE	C IV BOX A CON	TINUED ON SUPPLEMENTA	L PAGE		

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL. OR ENTER: SITE NAME MCCORMICK PAINT WORKS COMPANY 2355 LEWIS AVE ROCKVILLE, MD. 20851 EPA ID NO. M, D, D, O, O, 3, 2, 4, 8, 2, 7, 5	MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION 1988 Hazardous Waste Report and Shipment Report Waste Generation and Shipment Shipment
INSTRUCTIONS: Please read the detailed Generation and Shipment F Make and complete a phoshipped off site during 1 9 Complete Sections I througe	instructions beginning on page 12 of the 1988 Hazardous Waste Report Instructions booklet before completing this form.
Sec. A. Weste description Instruction Page 12	
Page 12	State hazardous waste code Page 13 Waste form code Page 13 G. Waste minimization results Page 13
	Page 18 Note
	Page 21 Page 21
Sec. Number of shipments hipped and shipments hipped hipped shipments hipped shipments hipped hipped shipments hipped h	O. Off-site T/S/D/R code Page 22 D K N A
Comments: SEC IV BOX A CONTINUED ON SUPPLEMENTAL	Page 4 of 10

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: SITE NAME MCCORMICK PAINT WORKS COMPANY 2355 LEWIS AVE ROCKVILLE, MD. 20851 EPA ID NO. M.D.D.O.O.3.2.4.8.2.7.5			FORM OI	MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION (RED) 1988 Hazardous Waste Generation and Shipment Report OFF-SITE IDENTIFICATION
WHO MUST COMP	LETE THIS FORM?	received hazardous waste fro	om off site during 1°	
	INSTRUCTIONS:	Generation and Shipment Re Complete A through E for ea received waste during 198 Complete A through D for ev	nstructions beginnin port Instructions boo ch off-site Installatio 8 ery transporter you t	og on page 23 of 1988 Hazardous Waste child before completing this form. In to which you shipped waste or from which you used during the reporting year.
		"NA" if the information reque	ested is not applicab	requested is not known or is not available; enter the. Make and complete additional copies of this e installations or transporters.
Shall a spars was defined				
1 Instruction page 23	5 2 4 3 7 0 6	B. Name of off-site installation or trans Page 23 ENVIROSAFE SERVIO	CES OF OHIO,	INC
C. Site type code Page 24	D. Site relationship code Page 24	E. Address of off-site Installation Page 24 876 OTTER CRI	EEK ROAD	
L F I	<u>D</u> j	City OREGON	Slate C) H Zip 4 3 6 1 6
2 instruction page 23	installation or transporter	B. Name of off-site installation or transpage 23 MICHIGAN DISPO		
C. Site type code	0 7 2 4 8 3 1	E. Address of off-site installation	SAL	
Page 24	Page 24	Page 24 49350 N. 194	SERVICE DRI	EVE
(F)	<u>[D</u>]	City BELLEVILLE	State []	1 I Zip 4 8 1 1 1 1
Site A. EPA ID No. of off-site instruction page 23	inatalistion or transporter	8. Name of off-site Installation or tran Page 23	sporter	
1 7	4101315181119	HORWITH TRU	CKS, INC.	
C. Site type code Page 24	D. Site relationship code Page 24	E. Address of off-site Installation Page 24	 -	
	ļ	Street NA		
LT	D	City	State _	Zip Code
Site A EPA IO No. of off-site 4 Instruction page 23	Installation or transporter	B. Name of off-site installation or tran Page 23	sporter	
		14411		
C. Site type code Page 24	D. Site relationship code Page 24	E. Address of off site installation Page 24		
]		Street		
		City	State	Zip Code
Comments:	1 <u>w. 1 w. 1 w. 1 w. 1 w. 1 w. 1 w. 1 w.</u>			
<u> </u>	<u> </u>			Page5_ of _10_

BEFORE OR ENT	COPYING FORM, ATTACH SITE IDENTIFIER:	CATION LABEL		MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
SITE NA		ORKS COMPANY	10年10月1月	ADMINISTRATION
	2355 LEWIS AVE ROCKVILLE, MD. 20	0851		1988 Hazardous Waste Report : and Shipment Report
EPA ID I	NO. [M, D, D, 0, 0, 3, 2, 4, 8	3 2 7 5	FORM	WASTE MINIMIZATION
			WM	PART I
WHO	MUST COMPLETE THIS FORM?	be completed by all gener	rators required to file ar to statutory provisions	implement waste minimization programs, must n Annual/Biennial Report. This requirement was included in the Hazardous and Solid Waste
		Uniform Hazardous Waste determined economically similar certification must a storage, or disposal perm	Manifest, that they has practicable, the volume also be made by gene it. Consistent with the	off site are required to certify, on item 16 of the we a program in place to reduce, to the degree of and toxicity of hazardous waste generated. A serators who have obtained a RCRA treatment, ese certification requirements, generators must o implement waste minimization programs.
ł	INSTRUCTIONS:	Please read the detailed in Shipment Report Instruction	nstructions on page 25 ns booklet before comp	of 1988 Hazardous Waste Generation and leting this form.
				orm enter "DK" if the information requested is not iton requested is not applicable.
1.	Did this site create or expand a s	ource reduction and rec	veling program?	
		1988	1987	Prior Years
		Yes No	Yes N	o Yes No
	Create	\mathbf{X}	X	
	Expand			
2.	Did this site have a <u>written</u> policy recycling of hazardous waste?	or statement that outline	-, .	and methods for source reduction and
l I		1988	1987	Prior Years
	Yes			L. I
	No	X	X	X
3.	What was the dollar amount of ca reduction and recycling of hazard	npital expenditures (plandous waste? ENTER ZE	it and equipment) ai RO (0) IF NONE.	nd operating costs devoted to source
		1988	1987	Prior Years
	Capital expenditures	\$0	\$0	<u> </u>
	Operating costs	\$	\$0	<u> </u>
4.	Did this site have an employee tra to identify and implement source	reduction and recycling	opportunities and	ses, awards, personal recognition, etc.) activities?
		1988	1987	Prior Years
		Yes No	Yes N	
	Training	x 🗌	K [
l	Incentives	\mathbf{x}	K [ו או או

Page 6

EPA ID NO) .	M _{DDD00} 32	4 ₁ 8 ₁ 2 ₁ 7 ₁	5]					
9.		t factors have delay T TO ALL THAT API	PLY.					U	RIGINAL
		a. Insufficient	capital to ins	stall new	recycling equi	oment or Implem	ent new recy	cling practices.	(RED)
			hnical inform			niques applicabl			
		c. Recycling i		nically fe	asible: cost sa	vings in waste n	nanagement o	or production	
			•			result of recyclin	ıg.		
		e. Requireme	nts to manife	est waste	s inhibit shipm	ents off site for r	ecycling.		
	X	f. Financial II	ability provis	lons inhit	olt shipments o	ff site for recyclic	ng.		
		g. Technical I	imitations of	product	processes Inhi	bit shipments of	site for recyc	ling.	
		h. Technical I	imitations of	producti	on processes i	nhibit on-site red	ycling.		
		i. Permitting	burdens inhi	bit recyc	ling.				
		j. Lack of pe	rmitted off-sl	te recycli	ng facilities.				
		k. Unable to	ldentify a ma	rket for re	ecyciable mate	rials.			
		i. Other (SPi	ECIFY)						
10.		this site requested cling practices from		ollowing	sources? MAF	RK 🗓 NEXT TO	ALL THAT API	PLY.	
			Ter	19 chnical	88 Financial	19 Technical	Financial	Prior ` Technical	rears Financial
	a.	Local government							
	b.	State government							
Į	c.	Federal governme	nt						
1	d.	Trade associations	;	X		X		K	
	e.	Educational Institu	tions						
	f.	Suppliers							
	g.	Other parts of you	r firm						
	h.	Other firms/consu	ltants						
	i.	No request made		x		x		\mathbf{x}	
	J.	Other (conference etc.)	s, literature,	X		х		X	
<u></u>	omme	inte:							
~	OHAIR	ans.							
i									

MARYLAND HAZARDOUS AND BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL SOLID WASTE MANAGEMENT OR ENTER: **ADMINISTRATION** McCORMICK PAINT WORKS COMPANY (RED) SITE NAME 2355 LEWIS AVE 1988 Hazardous Waste Report ROCKVILLE, MD. 20851 and Shipment Report [М. D. D. 0, 0, 3, 2, 4, 8, 2, 7, 5] **FORM** EPA ID NO. WASTE MINIMIZATION WM **PART II** WHO MUST COMPLETE THIS FORM? Form WM Part II must be completed only by generators that engaged in an activity during 1987 that resulted in waste minimization. Waste minimization means: (1) reduction in the volume and/or toxicity of hazardous waste generated as a result of source reduction; and/or, (2) reduction in the volume and/or toxicity of hazardous waste subsequently treated, stored, or disposed as a result of on-site or off-site recycling. X Mark 🕅 and do not complete this form if no waste minimization results were achieved during 1987. Please read the detailed instructions beginning on page 26 of 1988 Hazardous Waste INSTRUCTIONS: Generation and Shipment Report Instructions booklet before completing this form. Make and complete a photocopy of this form for each hazardous waste minimized in 1988 Complete Sections I through IV. Throughout this form enter *DK* if the information requested is not known or is not available; enter "NA" if the information requested is not applicable. A. EPA hazardous weste code D. Product or service B. State hazardous waste code C. Product or service description SIC code Instruction Page 27 Page 27 Page 27 Page H. Source description: E. Waste form code F. UOM G. Density Source code Page 27 Page 26 Page 26 Page 28 8.7 quantity generated B. 88 quantity generated D. Toxicity change code C. Production saff Page 31 Page 29 E. Waste minimization: recycling F. Waste m mization: source reduction Page 31 Page 32 Code Quantity recycled Code Quantity prevented 2. _ | 1. Sec. Narrative description of waste min ion project or activity and results achieved Instruction Page 39

of 10

Page

		*	
BEFORE COPYING FORM, ATTACH SITE IDENTIFIED OR ENTER: SITE NAME McCormick Paint 2355 Lewis Ave Roc	Works Co.		MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION 1987 Hazardous Waste Report and Shipment Report
EPA ID NO. MIDIDIO 13121418	<u>121715</u>	GS	WASTE GENERATION AND SHIPMENT
WHO MUST COMPLETE THIS FORM?	Mark Mit you are not required. Please read the detailed Generation and Shipment Make and complete a pahipped off site during 19. Complete Sections I through	luring 1987. uired to complete Form GS. Instructions beginning of Report Instructions booklet hotocopy of this form for 87. ugh IV. Throughout this form	on page 12 of the 1987 Hazardous Waste before completing this form. each hazardous waste generated on site of the information requested is not applicable.
SeiC. A Weate description I GNITABLE SOLVE NT IS B. EPA hazardous waste code Page 12	TANK WASH S MINERAL SPIR		VASTE PAINT,
D. SIC code Page 13 2851 E. Source code Page 13	, , , , , , , , , , , , , , , , , , ,	F. Waste form code Page 13	G. Weste minimization results Page 13
LOW LP LOW L LOW NOIS Test F Nois Nois Nois Nois G. ph H. Flashpoini I. Cys	Page 15 High (A) LB: Low (B) Note ()	Page 18 High LLL LOW LLL NO LOW LL NO NO TIE K. FAULIONICINE	
Sec. A. 1966 quantity nazardous waste generaled IIII Instruction Page 20 E. Quantity hazardous waste on site on January 1, 1987 Page 21		Cuantity hazardous waste remainin Page 21	_
Sec. A EPA 10 No. of facility to which waste was shipped instruction Page 22	B. Number of shipments Page 22 Page 22	Page 22	E. Total quantity shipped Page 22

Page ____ of ___

.

Comments: SEC. III E. WASTE ALLOWED TO SETTLE (TO FACILITATE WASTE MINIMIZATION)

SOLIDIFIED WITH CLAY AND DISPOSED IN APPROVED LANDFILL,

SEC. Does this site's EPA iD authorize hazardous waste generation?
NO —— SKIP TO SECTION VII.
YES Did this site generate any hazardous waste during 1987? YES READ DETAILED INSTRUCTION ON PAGE 4 OF THE 1987 HAZARDOUS WASTE GENERATION AND MANAGEMENT.
INSTRUCTIONS BOOKLET FOR ACUTE AND ACCUMULATION LIMITS. MARK XI NEXT TO THE HAZARDOUS WAST GENERATION QUANTITY CATEGORY THAT APPLIED TO THIS SITE DURING 1987.
Category 1: More than 1000 kg (2,200 lb) in one or more months Category 2: More than 100 kg (220 lb) but no more than 1000 kg (2,200 lb) in any single month Category 3: No more than 100 kg (220 lb) in any single month
Mark [X] if this site changed from Category 1 to Category 2 or 3 due to waste minimization activity conducted during 1985 or 1987.
NO —— CONTINUE BELOW, MARK X NEXT TO ALL THAT APPLY.
Generated, excluded or delisted wastes Generated hazardous waste prior to 1967 but do not expect to generate in the future - MARKIX FOR REASON IN ONE BOX BELOW
Waste was from one-time event(s) (e.g. spills, remedial actions, etc.) Waste minimization activity undertaken during 1986 or 1987 Out of business
Generated hazardous waste prior to 1987 and expect to generate in the future
Never generated before but expect to generate in the future Never generated and do not expect to generate in the future - MARK [X] FOR REASON IN ONE BOX BELOW
Protective notifier only Misunderstood the requirements
Notified to secure transportation services
Other EXPLAIN REASON FOR GENERATOR NOTIFICATION IN COMMENTS
SEC. Does this site have RCRA Interim Status or a RCRA permit to treat, store, or dispose hazardous waste?
NO — SKIP TO SECTION VIII
YES Did the site treat, store, or dispose (T/S/D) hazardous waste in RCRA-regulated units during 19877 [X] YES
T/S/D excluded waste during 1987
☐ T/S/D hazardous waste in exempt units during 1987 ☐ T/S/D hazardous waste prior to 1987 but did not T/S/D waste during 1987. MARK ☒ IN ONE BOX BELOW
T/S/D will resume in the future
☐ Have notified of planned closure ☐ Site is in closure or post closure
☐ Never T/S/D hazardous waste prior to 1987 but: MARK ☒ IN ONE BOX BELOW
Expect to T/S/D hazardous waste in the future Do not expect to T/S/D hazardous waste in the future - EXPLAIN REASON FOR INTERIM STATUS OR PERMIT IN COMMENTS
SEC. Do you wish to withdraw this site's generator notification or EPA Part A permit application?
Withdraw generator notification ☐ Yes ☑ No Withdraw Part A permit application ☐ Yes ☑ No
SEC. Does this site have an area not requiring a RCRA Part A or Part B permit that is used exclusively for the short term accumulation of hazardous waste?
⊠ NO
YES DOES THE AREA HAVE: Containers No Yes ENTER THE NUMBER OF TANKS AND THEIR TO CAPACITY IN GALLONS.
Containers No Yes Enter the Number of Author Capacity Tanks No Yes Number Gallon capacity
APR 1 1 1988
Hazardous Naete Divicina
Page 2 of (I

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: SITE NAME McCamick Pains Weeks Co 2355 Lewis Ave Receving Mo 20851 EPAID NO. M. D. D. O. 13, 2, 4,8, 2, 7,5				FOR	196	OLID WASTI ADMINI 37 Hazardou	HAZARDOUS AND E MANAGEMENT ISTRATION S Waste Generation gement Report
EPA ID NO.	الاتهاه اهراها	2,4,8,2,7,5		Gr			NERATION AND AGEMENT
WHO MUST	COMPLETE THIS FO		must be comple waste off site du		site that general	led hazardous	waste on site or shipped
	INSTRUCTIO	ONS: Please rea Generation Make and shipped of Complete	n and Manageme complete a pho if site during 1983 Sections I throug	Instructions 1 int Report Instructions otocopy of thi 7. in IV. Through	beginning on po ructions booklet b is form for <u>each</u>	er "DK" if the Ini	tate generated on site or formation requested is not
Sec. A. Waste de Instruction	ecription in Page 12 (ない)「月日 した	· · · · ·	WASH SUIL SPIR		പരന പുട	と できらし	. SOLVENT
B. EPA hazardous was Page 12 D. C.C. I		N/A N/	,	State hazardous Page 13		pvá Li	LIA LI
D. SIC code Page 13		ource code age 13	LO f	. Waste form code Page 13	<u> </u>	G. Waste Page	minimization resurts 13
Sec. A. Organica instruction. High [M] Low [P] Test [F] Note	High [_]	C. Total Solida Page 15 High A	D. Suspended Solk Page 13 High (A) Low (B) Note (L)	E. BTU Page 15 High (Low (F. Yoak I Page Meta 1 D; 2	ið Note 🔼 al High Low Tee
G. pH Page 18 High LLI-L Low LLI-L Note G		L Cyanides Page 19 High Z Low L Test L Note	low	Zi	K. Radioactive Page 20 Yes No No.	3. <u> </u> 4. <u> </u> 5. <u> </u>	
	ntity generated in Page 20	8. 1967 quantity genera Page 20	1137	C. UOM Page 21	D. Denaity Page 21 12 • □ Use/gal	كا	Weste origin Page 21 Code A On-site [] [] T/S/D/R code
F. On-sile T/S/D/R co		3,9,9, <u>2</u> ,	<u>03</u> . L	76	- LLL	7. L ^P 4	• <u>*</u> * <u>*</u>
IV Instructio	o. of hacility to which weste was ship n Page 22	ehipmenta Page 22		Page 23	/8/D/R code	E. Total Quantity Page 23	ehipped
1 A-D 125	HASTE ALLOWER LOCAL CAPPE	ی ۳۰ و ۱۳۰۶ میدر کس	E 13 5 5	6, ~ OR	ums Citte	تي تي تي ع ت وسحا	TOCCA-STOP

Page 3 of II

SITE NAME M	le Cerner Paist W	erks Co		ADMINISTRATION
9-	355 leve Alc Roa	Mr 20001		1987 Hazardous Waste Generation
-2-5	SE CENS IN E , VOL	400 1 TD 2021	FORM	and Management Report
EPA ID NO.	1 <u>D101013121418</u>	275	OI	OFF-SITE IDENTIFICATION
WHO MUST COM	PLETE THIS FORM?	Form Ol must be completed	by every site that shipp	ed hazardous waste off site and every site that
		received hazardous waste fro	om off site during 1987	•
	<u> </u>	Mark X if you are not requi	•	
	INSTRUCTIONS:	Please read the detailed in Generation and Managemen	natructions beginning t Report Instructions be	on page 27 of the 1987 Hazardous Waste booklet before completing this form.
		Complete A through E for ea	•	o which you shipped waste or from which you
İ		received waste during 1987. Complete A through D for ev	erv transporter you use	ed during the reporting year.
		Throughout this form enter "(DK" if the information rested is not applicable.	quested is not known or is not available; enter Make and complete additional copies of this
Site A. EPA ID No. of off-si	te installation or transporter	B. Name of off-site installation or trans	sporter	
1 instruction page 27		Page 27		
C. Site type code Page 28	D. Site relationship code Page 28	E. Address of off-site installation Page 28		
	h	Street		Zip
		City	State	Code
Site A EPA ID No. of off-st 2 Instruction page 27	te Installation or transporter	B. Name of off-site Instaltation or trans Page 27	sporter	
C. Site type code Page 28	D. Site relationship code Page 28	E. Address of off-site Installation Page 28		
		Street		
		ску	State L	Zip Code
Site A. EPA ID No. of off-si Instruction page 27	te installation or transporter	B. Name of off-site installation or tran Page 27	sporter	
C, Site type code	D. Site relationship code	E. Address of off-site installation		
Page 28	Page 28	Page 28		
1		Street		Zip
		Ску	State	
Site A EPA ID No. of off-sinstruction page 27	te Installation or transporter	Name of off-site installation or tran Page 27	sporter	
C. Site type code	D. Site relationship code	E. Address of off-site installation	_ _	
Page 26	Page 28	Page 28		
ļ _{1 k}		Street		Zip
<u></u>		City	State	
Comments:				
1				

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT

Page 5 of

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

OR ENTI	McCaemick Print W 2355 Lewis Ats, Ro	Form WM Part I, describing the completed by all generations.	FORM WM g efforts undertaken to imple restors required to file an Annu	PART I ment waste minimization programs, must al/Biennial Report. The Management Report and Management Report and Management Report al/Biennial Report. This requirement was
	INSTRUCTIONS:	Amendments of 1984 (HSV NOTE: Generators shipp Uniform Hazardous Waste determined economically similar certification must storage, or disposal per report, on Form WM Part I,	NA). Ding hazardous waste off site to Manifest, that they have a periodicable, the volume and also be made by generators it. Consistent with these of the efforts undertaken to Implement	are required to certify, on item 18 of the rogram in place to reduce, to the degree toxicity of hazardous waste generated. A who have obtained a RCRA treatment, intification requirements, generators must ement waste minimization programs.
	instructions.	Management Report Instru Answer questions 1 throug	ictions booklet before complet	ing this form. Iter "DK" if the information requested is not
1.	Did this site create or expand a s	ource reduction and red	cycling program?	
	,	1987	1986	Prior Years
		Yes No	Yes No	Yes No
	Create			
	Expand			
2.	Did this site have a written policy recycling of hazardous waste?	or statement that outlin	ned goals, objectives and	methods for source reduction and Prior Years
	Yes	: 📙		
	No	X		
3.	What was the dollar amount of ca reduction and recycling of hazard	apital expenditures (plan dous waste? ENTER ZE 1987	nt and equipment) and op ERO (0) IF NONE. 1986	perating costs devoted to source Prior Years
	Capital expenditures	s N=2	s NA	\$ NA
	, ,	\$50,000	\$ 50,000	\$ 50,000
	Operating costs	3 33 33	<u> </u>	* <u> / </u>
4.	Did this site have an employee to identify and implement source	reduction and recyclin	g opportunities and activi	
		1987 Yes No	1986 Yes No	Prior Years Yes No
	Training			
	Incentives			
L	Incentives			

5.	assessment	conduct a source redu t or audit is a procedure waste or the quantity wh	e that Identif	fles practice	es that can be impleme	ented to reduce th	ne generation of
		i,		987	1986	Prior Y	rears Corps
		;	Yes	No	Yes No	Yes	No (RED)
		Site-Wide				X	
		Process-Specific				凶	
6.		e Identify or implement nus waste generated at the		E REDUCT	TION opportunities to r	educe the volume	e and/or toxicity
				987	1986	Prior	
			Yes	No	Yes No	Yes	No ,
		ldentify				\boxtimes	닏
		Implement				X	
7.		practices. Lack of technical info processes. Source reduction is n will not recover the concern that productions. Technical limitations Permitting burdens.	Install new sometion on a conomication and a conomication a conomication and a conomicati	source redu source red lically feasib tment. ay decline a	uction equipment or influction techniques, appole: cost savings in was a result of source rec	nplement new sou plicable to my spe aste management	urce reduction ecific production
8.		e Identify or Implement erated at this site or sub	osequently t	treated, stor	red, or disposed of on	site or off site?	·
			19 Yes	987 No	1986 Yes No	Prlor ' Yes	Years No
		identify .	. J			[]	
		Implement				FZI □	\Box
		6.			RECEI	VED F	
A Las a description of the party of	- Commence of the Commence of	· ·			Arn -	Divices	Page 7 01 11

resulted in waste minimization. Waste minimization means: (1) reduction in the volume and/or toxicity of hazardous waste generated as a result of reduction; and/or,	red, or
(2) reduction in the volume and/or toxicity of hazardous waste subsequently treated, sto disposed as a result of on-alte or off-site recycling. Mark ⊠ and do not complete this form if no waste minimization results were achieved during Please read the detailed instructions beginning on page 30 of the 1987 Hazardous Generation and Management Report Instructions booklet before completing this form. Make and complete a photocopy of this form for each hazardous waste minimized in 1987. Complete Sections I through IV. Throughout this form enter "DK" if the information requested known or is not available; enter "NA" if the information requested is not applicable.	
Sec. A EPA hazardous waste code Instruction Page 31 Page	S ₁ ()
Page 32 Page 3	
Sec. A 1986 quantity generated B. 1987 quantity generated Page 33 C. Production ratio Page 35 D. Toxicity change code Page 35 C. Production ratio Page 35 Page 35 C. Production ratio Page 35 Page 36 Pa	
E. Waste minimization: recycling Page 35 Code	3
Sec. A Narrative description of waste minimization project or activity and results echieved instruction Page 43 PIAKIMIZED BATCH SIZE, OPTIMIZED PRODUCTION MIX TO MINIMIZE TANK CLEANING	

Sec. IV.			iOns: Answer questions 1 through 4. Mark 図 next to the effects produced by the source reduction and/or recycling activity on this form in Sections I through III.
1.			did this site's source reduction and/or recycling activity have on the quantity of water effluent by hazardous waste generation processes during 1987?
		a.	Increase in the quantity of water effluent
		b.	Decrease in the quantity of water effluent
	X	c.	No effect on the quantity of water effluent
		d.	Don't know
2.			did this site's source reduction and/or recycling activity have on the toxicity of water effluent produced us waste generation processes during 1987?
		a.	Increase in the concentration of hazardous constituents
		b.	Decrease in the concentration of hazardous constituents
	\boxtimes	c.	No effect on the concentration of hazardous constituents
		d.	Don't know
3.			did this site's source reduction and/or recycling activity have on the quantity of air emissions by hazardous waste generation processes during 1987?
}		a.	Increase in the quantity of air emissions
		b.	Decrease in the quantity of air emissions
	\boxtimes	c.	No effect on the quantity of air emissions
		d.	Don't know
4.			t did this site's source reduction and/or recycling activity have on the toxicity of the air emissions by hazardous waste generation processes during 1987?
}		a.	Increase in the concentration of hazardous constituents
}		b.	Decrease in the concentration of hazardous constituents
	因	C.	No effect on the concentration of hazardous constituents
		d.	Don't know
	Comme	nts:	WATER WASTE PRODUCED
			RECUIVED
ļ			· nn 1 l 10
1			Hazardous waste Division
			Hazarroon
ļ			· · ·

2355	SITE IDENTIFICATION LABEL SK PAIST WHERE CO S AME ROCKME MD 2085 1312141812775	FORM PS	SOLID WASTE ADMINIS 1987 Hazardous and Manag WASTE TREATI DISPOSAL, C	AZARDOUS AND MANAGEMENT STRATION Waste Generation ement Report MENT, STORAGE, OR RECYCLING S SYSTEMS			
WHO MUST COMPLETE THIS FORM? Form PS must be completed by every site that, during 1987, had one or more hazardous waste management systems, existing or under construction, composed of: (1) treatment, storage, disposal, or recycling processes subject to RCRA interim status or permit requirements; or (2) treatment, disposal, or recycling processes exempt from RCRA interim status or permit requirements. INSTRUCTIONS: Please read the detailed instructions beginning on page 44 of the 1987 Hazardous Waste Generation and Management Report Instructions booklet before completing this form. Make and complete a photocopy of this form for each hazardous waste treatment, storage, disposal or recycling system operated or under construction during 1987. Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.							
Sec. A. Weste treatment, storage, disposed or instruction Page 57 コロヤームルング・アンドア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・	PROCEEDS BY STORE TO STORE TO SOLE MAND SHIP TOOLS	PAINT WASTE IN THE VICES APPRICATION OF PRICES	8. System Ide Fige 87	ntification Number Letter			
C. On-site T/S/D/R code(s) Page 58 Code Year							
Sec. A 1987 Influent quantity Instruction Page 80 Total	B. UOM C. 1867 w Page 61 Total RCRA	111113	_	erri quantity			
Sec. A Maximum capacity Instruction Page 83	B. Operational capacity Page 64 N/A	C. UmMations on capacity Page 85 N / 13 1 2 3	D. Commercial availability code Page 63	E. Percent capacity commercially available Page 85			
Sec. A Life expectancy B. Expected change in maximum capacity during C. Increase or decrease in maximum capacity code Page 86 Page 86							
D. Amount of change Page 67	E. Expected year of change Page 87	F. Future commercial availabilit Page 87	y code G. Percent available Page 6				
<u> </u>	币	L	10) %				
Comments: * CHANGE	GRAD LAL			Page II of II			

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE KEPUK This report is for the calendar year ending December 31, 1986 Read All Instructions Carefully Before Making Any Entries on Form HAZARDOUS WASTE REPORT FOR 1986

والمراجع والمنافر والمنافرة والمنافر

I. NON-REGULATED STATUS Complete this section only if you of the standard state of the standard state of the standard state of the standard standa	did not generate regula	ated	1	Non-handler	0.7
MDD003248275 MCCORMICK PAINT WO	mmerce males	:5	2	Small Quantity Generator Exempt	- (
2355 LEWIS AVE	*ALVI (2) 3'14C'		5	Beneficial Use	
ROCKVILLE MD 200			9	Out of Business	
ATTN: ALLISON GOR	MOUL				
lease print/type with elite type (12 cha	racters per inch)	Th		-Regulated Status is Expected to	
II. GENERATOR'S EPA I.D. NUMI		ť",	□ For	986 only□ Permanen	tly
[FM]DD003248271	T/AC STT11		[] Other		
1 2	13 14 15		Other	,	
The same of the same of the proof of the same of the s	a and the same state of the facilities of the same	ساميد المسهور	C303 ENT	RY (OFFICIAL USE ONLY): [֓֞֞֞֓֞֓֞֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֡֓֓֓֡֡֓֓֓֓֡֡֓֓֡֡֡֓
III. NAME OF ESTABLISHMENT	1 4-1 1 1 1 1	111.		ka root til bild	
MICCORMICK PA	IMT MOR	risi i	COMITAIN	A LINCT I	
		استخب عسبان	والإنجاب والمستوان والموافق و	and the second of the second o	•··•
IV. ESTABLISHMENT MAILING A					
[3 2 3 5 5 L E WI 5	<u> </u>				
Street or P.O. Box				7.7	
4ROCKVILLE		111	mp	20851	
15 16 City or Town			41 42 State	47 51 2 Zip Code	
	ng ing sasahah dipagkan and mga di ni ning hi kan ngawa		والمارية المحاوية والمحاولة والمحاولة المحاولة المحاولة والمحاولة والمحاولة والمحاولة والمحاولة والمحاولة والم	ngan an ang gara sang nga sa	
V. LOCATION OF ESTABLISHME	NT (if different than	section	IV above)		
[5]					
15 16 Street or Route number		·.		45	
161 1 1 1 1 1 1 1 1 1	111111	111	1111	11111	
15 16			41 42 State	· · · · · · · · · · · · · · · · · · ·	
City or Town	a was the same of		State	Zip Code	
VI. ESTABLISHMENT CONTACT			·		
15 16	되이서				
Name (last and first)	,			73	
3011-770-3235	í				
70		•			
Phone No. (area code & no.)					
VII. CERTIFICATION	aka Mirangalan Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabupatèn Kabup Kabupatèn Kabupatèn	•		• ;	
VII. CERTIFICATION	ersonally examined and am	familiar with			
1 certify under penalty of law that I have p	of those individuals immedi	lately reconn	uible for obtaining the	INDOMARION, I Delieve In al Ind	
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ENVIRONMENTAL PROTECTION AGENCY

Generator ANNUAL Hazardous Waste Report for 1986 (cont.)

This report is for the calendar year ending December 31, 1986

Date rec'd: Rec'd by:	IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
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XIV. COMMENTS (enter Information by section number-see instructions)

Hazardous Wasta Divistal

Page 2 of 3

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

MDD003248275 MCCORMICK PAINT WORKS INC 2355 LEWIS AVE ROCKVILLE MD 20851 ATTN: ALLISON GORDON

E



FORM

MARYLAND HAZARDOUS AND **SOLID WASTE MANAGEMENT ADMINISTRATION**

1987 Hazardous Waste Generation and Management Report

> **IDENTIFICATION AND** CERTIFICATION



WHO MUST COMPLETE THIS FORM?	Form IC must be completed by every site that received this package,				
INSTRUCTIONS:	Please read the detailed instructions beginning on page 8 of the 1987 Hazardous Waste Generation and Management Report Instructions booklet before completing this form.				
	. •	IV and Sections V	through IX immediately. Complete Section V,		
SEC. Site name and physical location which may	differ from the mailing address.	Complete items A	through G.		
I. Mark X for items A, B, C, D, F, and G if sarr	ne as label; if different, enter co	rections. If label is	absent, enter Information.		
A. Site/company name Same as label		B. EPA IO No. Same sa label			
α →		or →	<u> </u>		
C. Address number and street name of physical location - If not two Same as label:	wn, enter industrial park, building name o	or other physical location of	description		
or →			ł		
D. City, town, village, etc.	· · · · · · · · · · · · · · · · · · ·	F, State	G. Zip Code		
1	TGOMERY	Same as label	Same as label		
or		<u> </u>			
SEC. Mailing address of site. Mark [X] for A, B, C, and D if same as label;	If different enter corrections		·		
A. Number and street name of mailing address	· · · · · · · · · · · · · · · · · · ·				
Same as label			Ī		
or	<u> </u>	·			
8. City, town, village, etc. Same as label		C. State Same as label	D. Zip Code Same as label		
or —-		or []	or		
SEC. III. Name, title, and telephone number of the p	erson who should be contacted	t if questions arise r	egarding this report.		
A. Please print: Last name First name	M.L. B. Title	· · · · · · · · · · · · · · · · · · ·	C. Telephone		
ALLISON GORDON	0 - E	rec. VIP	301 770-3235		
		<u>~</u>	Extension [[]		
SEC. N. Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. SIC codes are listed beginning on page 1 of the 1987 Hazardous Waste Generation, Shipment and Management Report Codebook.					
 	2. a	15 Masic Constantin	E. F.		
[2,8,5,1]					
1 certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.					
A. Please print: Last name First name	·	M.L	Titile		
ALLISON GORDON	S		Exac, V, P.		
8. Signature		·	Date of signature		
			Page 1 of 11		

ENVIRONMENTAL PROTECTION AGENCY

Generator ANNUAL Hazardous Waste Report for 1986 (cont.)

This report is for the calendar year ending December 31, 1986

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VIII. GENERATOR'S EPA I.D. NO.	this page were shipped)
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MDD095038998

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XIV. COMMENTS (enter information by section number-see instructions)

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OFFICE OF ENVIRONMENTAL PROGRAMS WASTE MANAGEMENT ADMINISTRATION

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HAZHUUUS	Masie	Generator	waste	neduction	Program

CRICINO (RED)

-Please complete both sides-

Company:	Mc CORMICK PAINT WORK (Name)	s <u>Co</u> <u>M</u> 3	OD 003248275 (EPA ID NUMBER)
Mailing Address:	2355 LEWIS AVE.	Rockville (City)	20851 (Zip Code)
Location Generator Site:	r		, 1
	(if	different from	n mailing address)
Contact Person:	G. ALLISON (Name)		301-770-3235 (Telephone Number)
	(Name)		(Telephone Number)
	(Signature)		(Title)
	(Signature)		(Title)
minimiza	ase provide information abou tion program. (If more spac sheet of paper and attach i	e is needed, pl	lease answer on a
l. Sepa	aration		
volume o	s your Company's waste colle f hazardous waste for dispos le materials?		
		Yes 🗹	No 🗀
	s your Company's waste colle f hazardous waste by keeping s waste?		
		Yes 🗹	No 🗀
	f yes, has the system been i he amount of hazardous waste		past year to further
		Yes 🔽	No 🗔

What reduction in volume was achieved in the past year?

25% MIN,

2. Substitution

Has your Company substituted a hazardous material with a nonhazardous or less hazardous material to reduce either the amount or toxicity of hazardous waste generated by your operation?

Yes 🗌

If yes, when was the substitute introduced, and to what extent has it reduced the toxicity or amount of hazardous waste generated in the last year?

Efficiency 3.

Has your Company improved the efficiency of its operations so as to make a waste stream that was sent off-site for disposal available for recycling?

Yes /

If yes, please describe the improvement and state when it was instituted.

1984-85 RECYCLED 100% WASH WATER

Has your company improved the efficiency of operation so as to reduce the amount of hazardous waste generated?

Yes 🔽

No

If yes, please describe the improvement and state when it was instituted.

> LARGER BATCHES WHERE POSSIBLE 84-85 LESS WATER OR SOLVENT UNIT PRODUCED

FOR CLEADUP بالمرافضية امتارا المناث Alana Salahah

12 1987

Marsenham Masta Obdelom

What amount of waste reduction was achieved in the last year?

25% MIN

OMGHAL (RED)

4. Recycling on-site

Does your Company's waste reduction program include a hazardous waste recycling operation on-site?

Yes V

№ □

If yes, please briefly describe the recycling operation and state when it was instituted.

REGYCLE WASH WATER

STARTED 1976 - IMPROVED ANNUALLY

What amount of waste reduction was achieved in the last year?

25% へい

4A. Recycling off-site

Does your Company's hazardous waste reduction program include use of an off-site recycling service?

Yes

, ব

If yes, please describe the recycling service that you use and state when its use was initiated.

What amount of waste reduction was achieved by use of the off-site recycling services last year?

5. Treatment on-site

Does your Company's hazardous waste reduction program include onsite waste treatment which minimizes the toxicity or amount of hazardous waste generated?

Yes 🗹 No 🗌

If yes, please briefly describe the treatment operation and state when it was instituted.

SOLVENT SEPARATED & RECYCLED
SLUDGE SOLIDIFIED
1983

To what extent has the treatment operation reduced toxicity or reduced the amount of hazardous waste generated in the past year?

JAN 12 1007
Hazardous Washe Durking

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MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1985

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Page 1 of _____

23 R0	GENERAL INSTRUCTIONS: If you received a preprinted label attached to the mailing envelope in which this form as enclosed, affix it in the space provided: If any of the formation on the label is incorrect, draw, a line through it of provide the correct information in the appropriate second below. If the information is correct and complete, leave of the information of the following the provide the correct information is correct and complete, leave of the information of the provide the correct information is correct and complete, leave of the information of the provide the correct information in the appropriate second below. If the information is correct and complete, leave of the provide the pro
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	VI. CERTIFICATION I certify under parally of law that I have personally examined and an familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true, accounter, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of line and impresonment.
	G. ALLISON T.D. SECTREAS. (18/1000 1/7/86
	Print/Type Name Title Signature of Authorized Representative Date Signed

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December ${\mathfrak R},\ 1985$

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ALABAMA 35459

XI. TRANSPORTATION SERVICES USED it is the name and EPA identity along numbers of all transporters whose services were used thining 1981. This vertice to be completed only once. Do not repeat on supplemental sheets.) DelT TRANSPORTATION SPECIALISTS INC NYD 088658646

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MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1984

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	re at Authorized Representative Date Signed

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Page 1 of 2

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MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1984

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DET TRANSPORTATION SPECIALISTS, INC.

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XIII. COMMENTS (enter information by section number-see instructions)

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MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31,- 1983

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G. ALLISON	T.D. SEC,	TREAS.	1/24/84
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MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1983

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APPENDIX D



 $(ReD)_{I}$

9426 Stewartown Road Post Office Box 2127 Gaithersburg, Maryland 20879 (301) 948-4000

January 11, 1984

Mr. John Kershner, Regional Inspector Maryland State Waste Management Administration Enforcement Division 201 West Preston Street Baltimore, Maryland 21201

Dear Mr. Kershner:

This letter is in reference to your request for information concerning empty drums, marked hazardous waste, that were on one of our construction compounds located near Snouffer School Road in Gaithersburg.

- 1) The drums were obtained from McCormick Paint Works Company in Rockville, Maryland.
 - 2) The drums were empty when we obtained them.
- 3) The drums were to be used for mixing cement, storing water for the mixing of mortar and for trash.
- 4) These drums had not as yet been used by Kettler Brothers.
- 5) The drums were left on the exterior of a new compound we were building for storage.

Should you need any additional information, please feel free to contact me.

Very truly yours

Richard G. Hines Vice President

Residential Construction

RGH/dbh

RECEIVED

JAN 17 198

FNFORCEMENT DIVIDION

RECEIVED

FEB 3 1984

ENFORCEMENT FILE FILE COPY ONLY



2355 LEWIS AVENUE * ROCKVILLE, MARYLAND 20851-2391 • 301 770-3235

January 6, 1984

C...GL.A.

State of Maryland
Department of Health & Mental Hygiene
Office of Environmental Programs
201 West Preston Street
Baltimore, Md. 21201

Dear Sirs,

This letter is in reply to the R.C.R.A. incident report/
Montgomery County dated 12/14/83 in which empty drums marked with
a hazardous waste label were found 50 yards south of Snouffer School
Road & Chelsea Knoll Drive intersection and approximately 1000 fft.
from the roadway.

After an inspection of our facility by Regional Inspector Mr. John Kershaer, I accompanied him to the site of the complaint. Fifteen empty drums, seven of which had a yellow hazardous waste label attached, were lying just outside a newly graded and fenced area in the middle of a large open field. There was no evidence of any material being spilt from the drums. While we were marking these drums (from 1-15) for storage at our plant in Rockville (for State inspection purposes) a truck belonging to Kettler Brothers Inc. (builders) pulled up and the driver asked if this site was the new storage yard for Kettler Brothers. Unable to answer we loaded the empty drums on our truck and brought them back to our plant for safekeeping.

In our manufacturing process and hazardous waste handling program we have an area of empty drums that are not suitable for re-use for one reason or another. Occasionally local builders will request to use some of these old drums for trash drums, mixing cement etc. on construction sites. These particular drums had been given to Kettler Brothers some time previously, at no charge. The location that they were found is Kettler Brothers new starage yard that is just being developed to replace their recently closed yard located on Goshen Road.

RECEIVED

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JAN 2 1984

ENFORCEMENT DIVISION

MENT FILE

During our hazardous waste handlings we found it more economical to ship solid waste rather than liquid waste to the facility at Emelle, Alabama. Several drums of liquid waste were (find transfered to other drums to be solidified and the empties after being scraped clean were placed in among the drums not to be used again. Unfortunately the hazardous labels were not removed. These were some of the empty drums Kettler Brothers were given the last time they needed drums.

We have since inspected our (unfit for re-use) empty drum storage area and found several more with hazardous waste labels on them. We have removed all labels from these drums and will make sure no empty drums leave our plant with labels on them. Hazardous waste labels will be affixed immediately we commence to solidify waste in a given drum, not before, and without waiting for that drum to be totally filled. All other empty drums will be triple rinsed.

I have asked Mr. Richard Hines, Vice President of Residential Construction of Kettler Brothers, Inc. to write to you confirming the fact that they do pick up empty drums from us on occasion and outline what they use them for.

I hope that his letter along with mine will resolve this incident to the States satisfaction. All of the employees of McCormick Paint Works Company are aware of the need to operate in an environmentally sound manner and will work diligently to make sure incidents like this one are not repeated. Kettler Brothers was in no way responsible for this incident, the fault being entirely McCormick Paint Works Company's.

Yours sincerely,

Gordon Allison

Sec/Treas. Technical Director

GA/jrc

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FEB 3 1984

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State of Maryland Department of the Environment Hazardous and Solid Waste Management Administration 2500 Broening Highway, Baltimore, Maryland 21224



Report of Observations

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February 1, 1991

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HSWMA ENFORCEMENT PROGRAM

Mr. Nigussie Retta
Public Health Engineer
Department of the Environment
Hazardous and Solid Waste Management Administration
State of Maryland
2500 Broening Highway
Baltimore, Maryland 21224

Dear Mr. Retta:

This letter is in response to your inspection report of January 10, 1991, to this office requesting information about the market for a finished product made from recycled solvent, dike for storage area and employees' training to handle controlled hazardous substances.

Mr. Retta inspected McCormick Paint Works Company on December 27, 1990; January 2, 1991; January 10, 1991; January 16, 1991 and January 28, 1991. During your inspection I told you about the satellite accumulation of recycled solvent and recycled solvent sludge. We are using recycled solvent (S10) on a daily basis in our paint in place of mineral spirits, which is a raw material for that paint. We have made alkyd paint for our own use for painting our tanks and drums (gray color) from recycled solvent sludge. I also demonstrated to you that with the help of the ACS computer, we can tint to any color. We are also able to make red oxide primer. We supplied our recycled paint to the Loading Dock. The Loading Dock issued us a certified recycled award and letter. Copies of award and letter are enclosed with this letter. Also S10 MSDS are enclosed.

What is recycled solvent? Tank washing with mineral spirits is a principal source of generated recycled solvent. Mineral spirits is a raw material for oil base paint.

We say that recycled solvents are not solid waste when recycled. We can demonstrate this in a couple of ways:

- 1. We are using recycled solvent from previous batches in the new batch of paints as S10 in place of mineral spirits.
- 2. If recycled solvent is a dark color, then we leave the drums of recycled solvent for settling. After about 30 days we use the top portion in place of mineral spirits in dark color paint. The recycled sludge we will use for red oxide primer, exterior wood stain or drum gray paint.

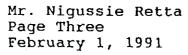
Mr. Nigussie Retta Page Two February 1, 1991

- We use recycled solvent for washing tanks.
- 4. Recently we have made 50 gal of gray alkyd paint from 30 gal recycled solvent sludge. We are using this paint for painting tanks and drums. Formulation is enclosed.
- 5. We have made a laboratory batch of red oxide primer from recycled solvent sludge for steel structures (Type I red oxide shop paint SSPC-Paint 15). Several companies are selling this type of red oxide primer. (Specification enclosed)
- 6. We are using dark recycled solvent in our exterior wood stains. This is standard production for our company. Color card is enclosed.

Now there is a question about the containment system. As per Mr. Retta's instructions, we made a dike area in our warehouse #3. Map, design and location are enclosed with this letter. This will be our storage area for recycled solvent with an accumulation of less than 90 days. Raw materials are protected by means of a dike. Containment has a sufficient capacity to contain more than 10% of the volume of containers. The containment has impervious ground. At this time, we have only 9 drums of recycled solvent without settling.

McCormick Paint's goal is zero waste. A large portion of the waste contains the same makeup as raw materials and the paints made. Tank washing is a principal source of generated recycled solvent. Everyone must be responsible for identifying and carry out waste minimization goal. Good house keeping is the easiest and often most inexpensive way to reduce waste. We are also eliminating tank cleanup in between two batches.

Future steps include segregating the solvent wash, so it can be used in the next batch of similar paint. Another project is to develop more formulation for inexpensive metal and wood primers that use some of the waste sludge. We are convincing employees to use a minimum amount of solvent to clean mixers and holding tanks was not easy. Employees were instructed to reuse recycled solvent until finished.





The last question about employees training to handle controlled hazardous substances. Ms. Karen Glantschnig, Safety Coordinator will explain to you in a separate letter.

If you need any additional information, please feel free to contact us. Thank you for your cooperation.

Sincerely,

Shi B. Kaurel

Shri B. Kansal Chief Chemist

Enclosures SBK:bb

APPENDIX E

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McCormick Paint Works Co.
CONTAINMENT
IN !!!
WAREHOUSE # 3

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